



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

FILED

04/09/26

03:10 PM

A2412011

In The Matter of Application of Southern
California Gas Company (U 904 G) for
Authorization to Implement Revenue Requirement
for Costs to Enable Commencement of Phase 2
Activities for Angeles Link

Application 24-12-011
(Filed 12/21/2024)

**OPENING COMMENTS OF CITY OF LOS ANGELES, ACTING BY AND THROUGH
ITS BOARD OF HARBOR COMMISSIONERS ON PROPOSED DECISION DENYING
SOUTHERN CALIFORNIA GAS COMPANY'S REQUEST FOR COST RECOVERY
FROM RATEPAYERS FOR PHASE 2 ACTIVITIES FOR ANGELES LINK PROJECT**

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April 9, 2025

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STATE OF CALIFORNIA**

In The Matter of Application of Southern
California Gas Company (U 904 G) for
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Activities for Angeles Link

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I. INTRODUCTION

The Port of Los Angeles respectfully submits these opening comments on the proposed decision denying Southern California Gas Company’s Request for Cost Recovery from Ratepayers for Phase 2 Activities for Angeles Link Project. As a recognized world leader for its cutting-edge environmental practices and programs, the Port of Los Angeles supports the state’s clean air goals and the development of clean renewable hydrogen. Should the Public Utilities Commission adopt its proposed decision, the Port of Los Angeles respectfully requests that the final decision be adopted without prejudice so that future efforts to bring renewable hydrogen to the Port of Angeles are not foreclosed or in any way discouraged.

II. THE PORT OF LOS ANGELES IS COMMITTED TO CLEAN AIR GOALS

The Port of Los Angeles is America's premier port and has a strong commitment to developing innovative, strategic and sustainable operations that benefit Southern California’s economy and quality of life. North America’s leading seaport by container volume and cargo value, the Port of Los Angeles facilitated \$301 billion in trade during 2025. The San Pedro Bay port complex operations and commerce facilitate one in nine jobs in the five-county Southern California region. The Port of Los Angeles includes twenty-five (25) major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger

facilities. In addition to cargo business operations, the Port of Los Angeles is home to commercial fishing vessels, shipyards, boat repair facilities, recreational, community, and educational facilities.

The Port of Los Angeles is recognized as a world leader for its cutting-edge environmental practices and programs. These include, but are not limited to, the landmark Clean Air Action Plan, the Technology Advancement Program, the Clean Truck Program, Alternative Maritime Power, Vessel Speed Reduction Plan, Greenhouse Gas Program, its 2030 goal to transition to zero emission equipment, and its 2035 goal to transition on road trucks that visit the Port to zero emission.

III. RENEWABLE HYDROGEN SUPPORTS THE PORT OF LOS ANGELES' CLEAN AIR GOALS

The Port of Los Angeles is continuing to aggressively pursue its clean air goals and supports renewable hydrogen delivery as an important component in their achievement. To reach the Port's Clean Air Action Plan goals in regard to zero emissions all available energy and technology pathways must be pursued, including hydrogen to ensure the ports remain resilient during this monumental transition. Dispatchable zero carbon intensity energy will be critical in delivery of renewable electricity to the Port and in running the vast amount of on and off-road vehicles and equipment that require extended duty cycles. Clean renewable hydrogen is a critical link to making our climate goals achievable and utilities have a critical role in scaling hydrogen use throughout the state. Thus, although the Port of Los Angeles respects that the timing may not be right for pressing forward with the Angeles Link Project, the Port supports keeping the door open for future proposals.

IV. ANY FINAL DECISION SHOULD BE WITHOUT PREJUDICE

Due to the importance of renewable hydrogen to the Port of Los Angeles' zero emissions goals, in the event the Commission adopts its proposed decision, the Port of Los Angeles requests that the final decision be made without prejudice so that future efforts to bring renewable hydrogen to the Port of Angeles are not foreclosed or in any way discouraged.

V. CONCLUSION

The Port of Los Angeles appreciates the opportunity to submit comments for the Commission's consideration.

Dated: April 9, 2026

Respectfully submitted,

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