

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298**FILED**

06/02/26

02:53 PM

C2411013

June 2, 2026

TO PARTIES OF RECORD IN CASE 24-11-013

This proceeding was filed on November 27, 2024, and is assigned to Commissioner John Reynolds and Administrative Law Judge (ALJ) Suman Mathews. This is the decision of the Presiding Officer, ALJ Mathews.

Any party to this adjudicatory proceeding may file and serve an Appeal of the Presiding Officer's Decision within 30 days of the date of issuance (*i.e.*, the date of mailing) of this decision. In addition, any Commissioner may request review of the Presiding Officer's Decision by filing and serving a Request for Review within 30 days of the date of issuance.

Appeals and Requests for Review must set forth specifically the grounds on which the appellant or requestor believes the Presiding Officer's Decision to be unlawful or erroneous. The purpose of an Appeal or Request for Review is to alert the Commission to a potential error, so that the error may be corrected expeditiously by the Commission. Vague assertions as to the record or the law, without citation, may be accorded little weight.

Appeals and Requests for Review must be served on all parties and accompanied by a certificate of service. Any party may file and serve a Response to an Appeal or Request for Review no later than 15 days after the date the Appeal or Request for Review was filed. In cases of multiple Appeals or Requests for Review, the Response may be to all such filings and may be filed 15 days after the last such Appeal or Request for Review was filed. Replies to Responses are not permitted. (*See*, generally, Rule 14.4 of the Commission's Rules of Practice and Procedure at [www.cpuc.ca.gov](http://www.cpuc.ca.gov).)

If no Appeal or Request for Review is filed within 30 days of the date of issuance of the Presiding Officer's Decision, the decision shall become the decision of the Commission. In this event, the Commission will designate a decision number and advise the parties by letter that the Presiding Officer's Decision has become the Commission's decision.

/s/ ANTHONY COLBERT for

Michelle Cooke

Chief Administrative Law Judge

MLC: smt

Attachment

Decision PRESIDING OFFICER'S DECISION OF ALJ MATHEWS (6/2/2026)

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

Communities for a Better Environment  
(CBE),

Complainant,

vs.

Southern California Gas Company,

Defendant.

Case 24-11-013

**PRESIDING OFFICER'S DECISION  
DISMISSING COMPLAINT**

**Summary**

This decision dismisses complaint Case 24-11-013 with prejudice. This proceeding is closed.

**1. Factual and Procedural Background**

**1.1. Historical Background**

On February 17, 2022, Southern California Gas Company (SoCalGas) filed Application (A.) 22-02-007 (Phase 1 Application) to request authority to establish a memorandum account to record the costs of planning a potential project, the Angeles Link Project (Project). The Project aims to build pipelines, including transmission pipelines, to deliver renewable hydrogen gas into the Los Angeles Basin. SoCalGas stated that this Project would advance the State's clean energy policy objectives of decarbonization and clean air goals by bringing renewable

hydrogen to the Los Angeles Basin as an energy source for “hard-to-electrify” industries and heavy-duty transportation sector and to replace natural gas supplied by Aliso Canyon. SoCalGas outlined the planning, but not the construction, of the Project over three activity phases including a feasibility study in Phase 1, a front-end engineering and design (FEED) study in Phase 2, and a Certificate of Public Convenience and Necessity (CPCN) in Phase 3.

On December 20, 2022, the California Public Utilities Commission (Commission) authorized SoCalGas to establish the Angeles Link Memorandum Account (Memo Account) to record specific Phase 1 Activity costs in Decision (D.) 22-12-055. This Decision provides multiple minimum requirements for compliance review if SoCalGas seeks recovery for Phase 1 Activities and to continue to Phase 2 of the Project. D.22-12-055 does not address jurisdiction insofar that it states, “jurisdiction will need to be addressed if and when SoCalGas files a subsequent application seeking authority either for a CPCN for the Project or for recovery of the costs recorded in the Memo Account.”<sup>1</sup>

## **1.2. The Instant Complaint and Adjudicatory Proceeding**

On November 27, 2024, Communities for a Better Environment (CBE or Complainant) filed the instant Complaint case (C.) 24-11-013 (Complaint) against Southern California Gas Company (SoCalGas) regarding SoCalGas’ alleged violation of D.22-12-055. Specifically, CBE alleges that SoCalGas failed to comply with mandates in D.22-12-055 requiring SoCalGas to conduct community engagement and study the environmental justice impacts of SoCalGas’ proposed Angeles Link Project. CBE alleges that SoCalGas’ failure to comply with D.22-12-055 constitutes conduct prohibited under Public Utilities (Pub. Util.) Code

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<sup>1</sup> D.22-12-055 at 8.

Section 702<sup>2</sup>, which states that “[e]very public utility shall obey and comply with every order, decision, direction, or rule made or prescribed by the commission in the matters specified in this part, or any other matter in any way relating to or affecting its business as a public utility, and shall do everything necessary or proper to secure compliance therewith by all of its officers, agents, and employees.”<sup>3</sup> CBE asserts that SoCalGas intentionally excluded non-Los Angeles based organizations from the community group engagement process, and that this exclusion led to failures to study and model project impacts, especially environmental justice impacts outside of the Los Angeles area.

CBE requests that the Commission find these failures to have occurred and that the failures violate Section 702. CBE also requests that the Commission order SoCalGas to remedy the failures before proceeding with the Angeles Link Project. Furthermore, CBE requests that the Commission appoint a staff member to ensure that future actions by SoCalGas related to the Angeles Link Project do not violate Commission decisions, rulings or orders.

On January 31, 2025, SoCalGas concurrently filed its Motion to Dismiss the Complaint (Motion to Dismiss) and its Answer to Complaint (Answer). In its Motion to Dismiss, SoCalGas argued that 1) the Complaint should be dismissed because it fails to satisfy the requirements of Public Utilities Code Section 1702<sup>4</sup>

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<sup>2</sup> Hereinafter referred to as “Section 702”.

<sup>3</sup> Pub. Util. Code Section 702.

<sup>4</sup> Pub. Util. Code Section 1702 states: “Complaint may be made by the commission of its own motion or by any corporation or person, chamber of commerce, board of trade, labor organization, or any civic, commercial, mercantile, traffic, agricultural, or manufacturing association or organization, or any body politic or municipal corporation, by written petition or complaint, setting forth any act or thing done or omitted to be done by any public utility, including any rule or charge heretofore established or fixed by or for any public utility, in violation or claimed to be in violation, of any provision of law or of any order or rule of the commission.”

and 2) the Complaint should be dismissed with prejudice because it is procedurally deficient and cannot be cured.

In its Answer, SoCalGas responded to each material allegation in the Complaint and identified its affirmative defenses to the Complaint. SoCalGas also argued in its Answer that: 1) the Complaint fails as a matter of law because it fails to state a violation of any law or Commission order or rule, as required by Public Utilities Code Section 1702; 2) the Complaint is procedurally deficient because the Commission did not direct Complainant's issues/allegations to be adjudicated through the Complaint process, and that Complainant's allegations are more appropriate for ongoing or future Commission proceedings; and 3) the Complaint fails to allege that Complainant suffered any specific injury such that Complainant lacks standing to bring this Complaint.

On February 18, 2025, CBE filed its Response to SoCalGas' Motion to Dismiss (Response). In the Response, CBE argued that 1) the Complaint meets every criteria of the Commission's pleading standard; 2) the injury to CBE is clearly stated and need only be reasonably inferred; 3) the Complaint establishes CBE's standing; 4) SoCalGas' arguments regarding improper forum are baseless; 5) SoCalGas' claim that other parties are excluded is without merit since any affected party may move to intervene; 6) Commission Orders are properly read in the context of findings of fact and conclusions of law; and 7) any potential dismissal should allow CBE to amend its Complaint.

On March 7, 2025, SoCalGas filed a Reply to CBE's Response to Motion to Dismiss (Reply). In its Reply, SoCalGas argued that 1) the Complaint cannot prevail under either of the Commission's standards of review for a motion to dismiss; 2) CBE failed to demonstrate standing, and that its injury claim was

insufficient; 3) CBE's preferred forum of a complaint proceeding would limit participation; and 4) the Complaint should be dismissed with prejudice.

On March 18, 2025, the assigned Administrative Law Judge (ALJ) issued a ruling setting a prehearing conference (PHC) for April 3, 2025. The ruling also directed CBE and SoCalGas to meet and confer and file PHC statements addressing specific topics.

On March 28, 2025, both CBE and SoCalGas filed their respective PHC statements as directed.

On April 3, 2025, the assigned ALJ held a telephonic PHC to identify the issues of law and fact, the need for hearing, the proceeding schedule, and to address other matters as necessary.

### **1.3. Relevant Activity Since the Complaint was Filed**

On December 20, 2024, SoCalGas filed A.24-12-011 (Phase 2 Application) to request authorization to implement revenue requirement for costs to enable the commencement of Phase 2 Activities of the Angeles Link Project.

On June 12, 2025, SoCalGas filed A.25-06-011 requesting that the Commission authorize SoCalGas to recover costs recorded in its Angeles Link Memorandum Account (Phase 1 Compliance Application). On September 29, 2025, the assigned Commissioner issued the Scoping Memo in A.25-06-011 which identified the issues to be determined or otherwise considered in that proceeding. Notably, Issue Number 2 in the Scoping Memo for A.25-06-011, which asks "[d]id SoCalGas comply with D.22-12-055 for Phase 1 Activities for the Angeles Link Project?", is an issue that encompasses the subject of the instant Complaint. Thus, it is apparent that the issues raised in the Complaint are set to be addressed in A.25-06-011.

On November 20, 2025, the Commission issued D.25-11-017, an Order Extending Statutory Deadline (OESD) for the proceeding. The Commission deemed an extension of the statutory deadline was necessary because the issues contained in C.24-11-013 overlap with those in A.25-06-011. Given that a scoping memo was recently issued in A.25-06-011, the Commission determined that closer examination of both proceedings and their overlapping issues was needed to determine the proper course of action for C.24-11-013.

On December 11, 2025, CBE filed a Petition for Modification of the OESD requesting that certain language in the OESD describing CBE as a party to A.25-06-011 be stricken. Specifically, CBE requested the following change in the OESD:

“Current language with proposed correction:

An extension of the statutory deadline is necessary because the issues contained in C.24-11-013 overlap with those in a related proceeding, Application (A.) 25-06-011, ~~in which Complainant is also a party.~~

Final modified language:

An extension of the statutory deadline is necessary because the issues contained in C.24-11-013 overlap with those in a related proceeding, Application (A.) 25-06-011.”

On January 12, 2026, SoCalGas filed its Response to CBE’s Petition for Modification of the OESD. In its Response, SoCalGas stated, among other things, that it did not oppose the Commission clarifying D.25-11-017 regarding CBE’s party status in A.25-06-011. On January 15, 2026, the Assigned Commissioner issued the Scoping Memo and Ruling for the matter.

## **2. Submission Date**

This matter was submitted on January 15, 2026 upon issuance of the Assigned Commissioner’s Scoping Memo and Ruling.

### **3. Issues Before the Commission**

The Scoping Memo and Ruling set forth the following scoped issues:

1. Should the Complaint be dismissed under Rule 4.1(b)?
2. Should the Complaint be dismissed if the issues contained therein are being properly addressed in A.25-06-011?
3. Should the language in the Order Extending Statutory Deadline be corrected as follows:

“An extension of the statutory deadline is necessary because the issues contained in C.24-11-013 overlap with those in a related proceeding, A.25-06-011.”

4. Should the Petition for Modification filed by CBE be dismissed if and/or when the language in Issue No. 3, above, is corrected?

### **4. Discussion**

#### **4.1. Issues 1 and 2- Dismissal of the Complaint Is Warranted Under Rule 4.1(b) and By Virtue of A.25-06-011**

We find that the instant complaint should be dismissed under Rule 4.1(b), and because the issues contained in the Complaint are set to be, and are more appropriately, addressed in A.25-06-011. Under Rule 4.1(b) of the Commission’s Rules, “[n]o complaint shall be entertained by the Commission, except upon its own motion, as to the reasonableness of any rates or charges of any gas, electrical, water, or telephone corporation, unless it be signed by the mayor or the president or chairman of the board of trustees or a majority of the council, commission, or other legislative body of the city or city and county within which the alleged violation occurred, or by not less than 25 actual or prospective consumers or purchasers of such gas, electric, water, or telephone service.” As discussed above, the Complaint involves the issue of whether SoCalGas complied with the requirements in D.22-12-055 that it conduct community

engagement and study the environmental justice impacts of SoCalGas' proposed Angeles Link Project. As also discussed above, A.25-06-011 involves the question of whether the costs SoCalGas incurred in executing Angeles Link Phase 1 activities are reasonable such that SoCalGas may recover the associated revenue requirement in rates.

One of the scoped issues in A.25-06-011 is the same as the core issue in the Complaint: Whether SoCalGas complied with D.22-12-055? The question *both* the Complaint and Application are asking is whether SoCalGas complied with mandates set forth in D.22-12-055, and A.25-06-011 goes further to address whether SoCalGas is entitled to recover costs associated with Angeles Link Phase 1 activities. Since the primary issue in the Complaint involves the question of whether SoCalGas complied with D.22-12-055, and this is the same issue raised in A.25-06-011 as it pertains to SoCalGas' ability to recover costs, it is appropriate to resolve the issue through A.25-06-011 and not the Complaint.

Moreover, Rule 4.1(b) contemplates that a complaint which addresses the reasonableness of rates or charges shall not be entertained by the Commission in a complaint proceeding. Instead, it is appropriate for the reasonableness of rates or charges to be addressed through a ratesetting or rulemaking proceeding such as A.25-06-011. Although the instant Complaint does not explicitly state that it is challenging the reasonableness of SoCalGas' rates or charges, the fact is that the issue identified in the Complaint is the same as one of the issues raised in A.25-06-011, which is whether SoCalGas complied with D.22-12-055 such that it can recover costs associated with Angeles Link Phase 1 activities. As stated, *supra*, issues such as rate recovery and reasonableness of rates are not to be resolved in a complaint proceeding. Instead, it is appropriate for the issue of rate recovery and the reasonableness of rates or charges to be addressed through a

ratesetting proceeding like A.25-06-011. As such the Complaint must be dismissed under Rule 4.1(b) and because the issue raised in the Complaint is subsumed by the issues set forth, and set to be resolved, in A.25-06-011.

**4.2. Issue 3- Correction of Language in the OESD is Warranted**

In its Petition for Modification of the OESD (Petition), Complainant requested that certain language describing CBE as a party to A.25-06-011 be stricken. In the Petition, Complainant explains that it is the California Environmental Justice Alliance (CEJA) and not CBE that is a party in A.25-06-011. Complainant further explains that CBE provides legal representation to CEJA in A.25-06-011 as well as other Commission proceedings. Specifically, Complainant requests that the language in the OESD be modified to exclude reference of Complainant as a party, from:

“An extension of the statutory deadline is necessary because the issues contained in C.24-11-013 overlap with those in a related proceeding, Application (A.) 25-06-011, in which Complainant is also a party.”

to:

“An extension of the statutory deadline is necessary because the issues contained in C.24-11-013 overlap with those in a related proceeding, Application (A.) 25-06-011.”

We agree that the language should be corrected as noted above given that that CEJA is the named party in A.25-06-011 and CBE is not. The correction to the language is warranted given that CBE is not a party to A.25-06-011 but instead is providing legal representation to CEJA in that proceeding.

**4.3. Issue 4- The Petition for Modification Should Be Dismissed**

Once the language is corrected in the OESD to reflect that Complainant is not a party to A.25-06-011, it is appropriate to dismiss the Petition. The issues

raised in the Petition will be moot once the OESD is corrected. Accordingly, the Petition will be dismissed once the language in the OESD is corrected to accurately state:

“An extension of the statutory deadline is necessary because the issues contained in C.24-11-013 overlap with those in a related proceeding, Application (A.) 25-06-011.”

**5. Conclusion**

The Commission should dismiss this Complaint with prejudice once the corrections discussed above are made to the OESD.

**6. Category of Proceeding**

This matter has been categorized as adjudicatory. Hearings are not necessary.

**7. Appeal or Review of Presiding Officer’s Decision**

The presiding officer’s decision in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code. Pursuant to Rule 14.4 of the Commission’s Rules of Practice and Procedure, any party may file an appeal of the presiding officer’s decision within 30 days of the date the decision is served. In addition, any Commissioner may request review of the presiding officer’s decision by filing a request for review within 30 days of the date the decision is served.

**8. Assignment of Proceeding**

John Reynolds is the assigned Commissioner and Suman Mathews is the assigned Administrative Law Judge and Presiding Officer in this proceeding.

**Findings of Fact**

1. Rule 4.1(b) contemplates that a complaint which addresses the reasonableness of rates or charges shall not be entertained by the Commission.

2. Application (A.) 25-06-011 addresses the issue of whether SoCalGas complied with D.22-12-055 such that it can recover costs associated with Angeles Link Phase 1 activities.

3. The primary issue identified in the Complaint is set to be resolved in A.25-06-011.

**Conclusions of Law**

1. The Complaint should be dismissed pursuant to Rule 4.1(b) and by virtue of the fact that the issues raised in the Complaint are set to be resolved in A.25-06-011.

2. The Complaint should be dismissed with prejudice.

3. Case 24-11-013 should be closed.

**ORDER**

**IT IS ORDERED** that:

1. The Complaint is dismissed with prejudice.

2. Case 24-11-013 is closed.

This order is effective today.

Dated \_\_\_\_\_, at San Francisco, California.