

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



FILED

07/02/26

04:59 PM

A2510008

Application of SOUTHERN CALIFORNIA GAS
COMPANY (U 904 G) Proposing Woody Biomass
Pilot Project.

A.25-10-008
(Filed October 15, 2025)

**RESPONSE OF SOUTHERN CALIFORNIA GAS COMPANY TO ADMINISTRATIVE
LAW JUDGE'S JUNE 29, 2026 RULING QUESTIONS**

ISMAEL BAUTISTA, JR.

Attorney for:
SOUTHERN CALIFORNIA GAS COMPANY
555 West Fifth Street, Suite 1400, GT14G1
Los Angeles, California 90013
Telephone: (213) 231-5978
Facsimile: (213) 629-9620
E-Mail: IBautista@SoCalGas.com

July 2, 2026

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

Application of SOUTHERN CALIFORNIA GAS
COMPANY (U 904 G) Proposing Woody Biomass
Pilot Project.

A.25-10-008
(Filed October 15, 2025)

**RESPONSE OF SOUTHERN CALIFORNIA GAS COMPANY TO ADMINISTRATIVE
LAW JUDGE’S JUNE 29, 2026 RULING QUESTIONS**

Pursuant to the Administrative Law Judge’s (ALJ) Email Ruling Directing Southern California Gas Company to File Response to Questions (Ruling) dated June 29, 2026, Southern California Gas Company (SoCalGas) hereby submits its Response to the Ruling in the above captioned proceeding.

I. INTRODUCTION

As noted in the Ruling, SoCalGas seeks clarification on whether pursuant to the ALJ’s Ruling Granting Sierra Club Motion in Part to Allow Sur-Rebuttal Testimony, Granting Sierra Club Motion for Evidentiary Hearing, and Revising Procedural Schedule issued on May 21, 2026 (May 21 Ruling) SoCalGas would have an opportunity to elicit direct testimony at the hearings to rebut Sierra Club’s Sur-Rebuttal Testimony. The May 21 Ruling provides that the “inclusion of evidentiary hearing on the procedural schedule provides an additional opportunity for argument and thus preserves due process.” Such language implies that to preserve SoCalGas’s due process rights, SoCalGas would have an opportunity to examine its witnesses on Sierra Club’s Sur-Rebuttal Testimony because SoCalGas was not afforded an opportunity to file a response to such testimony totaling 34 pages long. Such language would also be consistent with Rule 13.8, which allows parties to elicit oral testimony at hearings if no prepared testimony is offered.

Furthermore, the May 21 Ruling granted Sierra Club’s request to respond to (i) an updated number in Table 3 of SoCalGas’s Corrected Revised Directed and a 4-page memorandum thereto, and (ii) 17 lines in SoCalGas’s Rebuttal Testimony. Sierra Club’s Sur-Rebuttal Testimony, however, includes multiple pages that exceed the scope of the testimony it

sought to strike. If the Ruling intended for SoCalGas to elicit oral testimony from its witnesses on Sierra Club's Sur-Rebuttal Testimony, a Motion in Limine to exclude evidence exceeding the scope of the May 21 Ruling would be unnecessary.

Therefore, a clarification regarding SoCalGas's ability to offer oral testimony at the hearings would protect SoCalGas's due process rights.

II. QUESTIONS

1. Identify the topic(s) in Sierra Club's sur-rebuttal testimony on which would SoCalGas seek to testify, and the witness for each proposed topic.

- (1) Emissions methodology of accounting and analysis not provided in Sierra Club's direct testimony. Witnesses: James Lucas and Dr. Matthew Summers.
- (2) Health risk assessment. Witness: Dr. Matthew Summers.
- (3) Accidental risk assessment. Witness: Dr. Matthew Summers.

2. Explain why SoCalGas did not address the topic in opening testimony.

Sierra Club's Sur-Rebuttal raises several new issues in response to SoCalGas's Rebuttal Testimony.

(1) Emissions Methodology

SoCalGas was unable to address certain aspects of Sierra Club's emissions accounting and analysis methodology in its opening testimony because Sierra Club introduced new evidence that is inconsistent with the assumptions and framework used in SoCalGas's initial filing. Two such examples are as follows:

a) **Sierra Club Introduces Figure 1, Which Is not Illustrative of the Pilot Project**

In Sierra Club's Sur-Rebuttal testimony, Dr. Grubert states:

"Figure 1 below is a demonstrative that illustrates my explanation. It shows that converting woody biomass to bio-synthetic natural gas ("Bio-SNG") (i.e., methane), as the Project proposes, will lead to CO₂ emissions through combusting (i.e., burning) the methane".¹ This figure incorrectly represents the baseline case for the SB 1440 Pilot Project.

¹ Sur-Rebuttal Testimony of Sierra Club (Dr. Grubert) at 5-6.

Below is a screenshot of Sierra Club’s Figure 1:

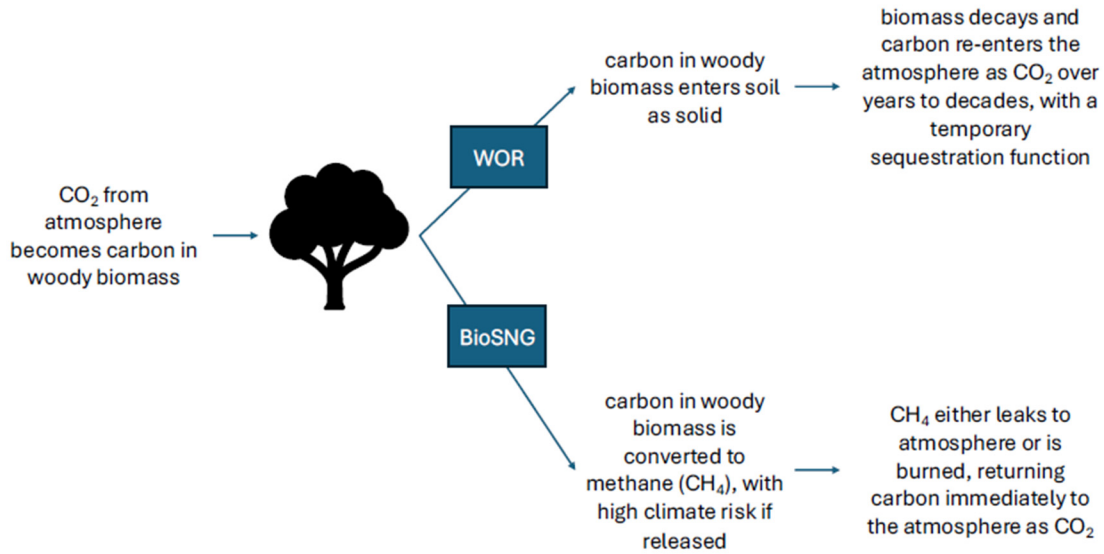


Figure 1: Comparison of CO₂ and CH₄ Emissions from Whole Orchard Recycling to CO₂ and CH₄ Emissions from Manufacturing and Combusting Bio-SNG.

However, Figure 1 is not consistent with Table 1 of SoCalGas’s Corrected Revised Direct Testimony (Chapter 2) because the base case includes four sources of biogenic CO₂ emissions: (1) dairy bedding, (2) air curtain incineration, (3) incorporation (whole orchard recycling), and (4) biomass plants.² In other words, the arrow in Figure 1 pointing upwards should include three more boxes (dairy bedding, air curtain incineration, and biomass plants) in addition to the whole orchard recycling (WOR) box. A screenshot of SoCalGas’s Table 1 is below showing the four biogenic CO₂ emissions under the column titled “Base case disposal method”:

² Corrected Revised Prepared Testimony of James Lucas and Dr. Matthew D. Summers at JLMS-15, available at: <https://docs.epuc.ca.gov/PublishedDocs/SupDoc/A2510008/9111/604598882.pdf>.

Table 1
Baseline Carbon Intensity and Criteria Pollutant Emissions

Biomass type	%	Base case disposal method	Qty	CI	NOx	PM 10	VOC	CO	SOx
			kg/hr	gCO2e /MJ	mg/MJ				
Almond shells	20%	100% dairy bedding	608	16.5	0.87	0.06	0.09	0.64	0.01
Sticks	10%	50% air curtain inc.	152	6.8	3.95	18.01	0.98	16.26	1.14
		50% biomass plant	152	8.2	5.07	0.12	0.07	0.90	9.32
Orchard removal	70%	90% incorporation	1914	100.9	2.73	0.18	0.29	2.00	0.04
		10% biomass plant	213	11.5	7.08	0.17	0.10	1.25	13.00
Total	100%		3038	143.9	19.69	18.55	1.53	21.05	23.53

The Pilot Project’s use case includes two sources of biogenic CO2 emissions: (1) Bio-SNG plant direct emissions, and (2) vehicle operation. SoCalGas would not have been able to contemplate the scenario in Figure 1 in opening testimony because it does not accurately represent and illustrate the Pilot Project.

b) Sierra Club Introduces the 2025 R&D GREET Model

As stated in SoCalGas’s opening testimony, the emissions reduction analysis relies on the 2024 R&D GREET model to calculate the net carbon intensity of the Pilot Project.³ Yet, on page 2 (lines 15–21) and in Attachment 1 of Sierra Club’s sur-rebuttal testimony (Dr. Grubert), Sierra Club uses the R&D GREET 2025 Rev.1 model (released on May 26, 2026),⁴ rather than the 2024 R&D GREET model relied upon by SoCalGas, to derive a revised carbon intensity for biogas combustion, thereby introducing methodological inconsistency and limiting direct comparability with SoCalGas’s analysis. SoCalGas could not have contemplated or utilized the R&D GREET 2025 Rev.1 model in its opening testimony, as this version was only released just over one month ago and not available at the time of SoCalGas’s application filed on 10/15/25.

(2) Health Risk Assessment and Sensitive Receptors

SoCalGas did not address the completion of a health risk assessment or identify sensitive receptors in its opening testimony because such an assessment is not required under Decisions

³ Corrected Revised Prepared Testimony of James Lucas and Dr. Matthew D. Summers, Attachment 1 at 1, fn. 1.

⁴ Available at <https://greet.anl.gov/>.

22-02-025 or 24-12-032, nor is it required at this early stage by the San Joaquin Valley Air Pollution Control District (SJVAPCD). The completion of a health risk assessment and identification of sensitive receptors will be completed as part of the permitting process with SJVAPCD.⁵ In opening testimony, SoCalGas lists the various permits that will need to be obtained and one of the types of permits identified is “Applicable Air Quality Permit(s) from the San Joaquin Air Pollution Control District.”⁶

In response to certain claims regarding local air impacts in Sierra Club’s testimony, SoCalGas used the term “health risk assessment” once in its Rebuttal Testimony, stating, “Under the CARB Air Toxics Hot Spots program and SJVAPCD health risk assessment practices, meaningful air toxics impacts are localized near emission sources.”⁷ Notably, in its Motion to Strike portions of SoCalGas’s Corrected Revised Testimony and Rebuttal Testimony, Sierra Club did not propose to strike this sentence. With respect to the term “sensitive receptor,” SoCalGas uses it once in Rebuttal Testimony, stating “The San Joaquin Valley Air Pollution Control District (SJVAPCD) will evaluate air toxics impacts at the property line and nearest sensitive receptors as part of the permitting process.”⁸ Notably, in its Motion to Strike portions of SoCalGas’s Corrected Revised Testimony and Rebuttal Testimony, Sierra Club did not propose to strike this sentence. Nevertheless, Sierra Club’s Sur-Rebuttal Testimony includes five pages of new claims and assertions focused on health risk assessments and sensitive receptors.⁹ There is no requirement, nor would it be reasonable, for SoCalGas to include a health risk assessment or identify sensitive receptors in its opening testimony because such analyses would occur only after the Commission approval of the application.

⁵ See SJVUAPCD’s Risk Management Policy for Permitting New and Modified Sources at 3 (stating, “All projects resulting in increases in hourly, daily, or annual potential to emit hazardous air pollutants, except projects specifically exempted from risk review in approved District permitting policies, shall undergo public health risk evaluation as a part of the permit review process prior any final decision on Authority to Construct or Permits to Operate.”), *available at*: <https://www.valleyair.org/media/lnapxbro/apr-1905.pdf>.

⁶ Corrected Revised Prepared Testimony of James Lucas and Dr. Matthew D. Summers at JLMS-13.

⁷ SoCalGas Prepared Rebuttal Testimony at JLMS-30, lines 7-8, *available at*: <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2510008/9123/604541842.pdf>.

⁸ SoCalGas Prepared Rebuttal Testimony at JLMS-29, lines 22-24, *available at*: <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2510008/9123/604541842.pdf>.

⁹ Sierra Club Sur-Rebuttal Testimony at 21-26.

