

Rulemaking: 22-09-006
Exhibit: OCU/LCJA 4
Date: August 29, 2025
Witness: Jamie Zweifler-Katz

**PREPARED OPENING TESTIMONY OF JAMIE ZWEIFLER-KATZ ON BEHALF OF
ORANGE COVE UNITED AND LEADERSHIP COUNSEL FOR JUSTICE AND
ACCOUNTABILITY ON THE APPLICATION OF SOUTHERN CALIFORNIA GAS
COMPANY, SAN DIEGO GAS & ELECTRIC COMPANY, PACIFIC GAS AND
ELECTRIC COMPANY AND SOUTHWEST GAS CORPORATION TO ESTABLISH
HYDROGEN BLENDING DEMONSTRATION PROJECTS**

Before the California Public Utilities Commission

August 29, 2025

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I. Introduction

The following testimony was prepared for Leadership Counsel for Justice and Accountability (“Leadership Counsel”) and Orange Cove United with respect to issues posed in the Assigned Commissioner’s Scoping Memo and Ruling in A.22-09-006. My testimony is most relevant to questions 4 (Are the pilot projects safe?) and 5 (Are the pilots equitable and do the pilots create any positive or negative community impacts?).

II. Discussion

On August 2, 2025 and August 14, 2025 I conducted a total of five home visits to homes in Orange Cove with Desiree Valiente, a legal intern working with Leadership Counsel at the time. These visits consisted of asking residents a series of questions about their home, their family, and their gas appliances. We also took photographs of gas appliances. A true and correct copy of a report summarizing the results of the home visits, including certain photographs, is attached as Exhibit B.

On August 23, 2024, I submitted a public records act request to the City of Orange Cove via email. A true and correct copy of the public records act request is attached as Exhibit C.

On January 6, 2025, the City of Orange Cove responded to the public records act request. A true and correct copy of the entirety of the City’s response is attached as Exhibit D. This response is relevant to, among other things, the information that SoCalGas provided to the City of Orange Cove to inform the City’s position related to the proposed pilot project. This information, or lack thereof, is relevant to question 5 (Are the pilots equitable and do the pilots create any positive or negative community impacts?) and related to informed consent and public support.

III. Statement of Qualifications

I am an attorney with Leadership Counsel, and serve as counsel of record for Orange Cove United in this proceeding. My testimony is based on my personal knowledge and my experience as an attorney with Leadership Counsel. In my experience as an attorney I submit requests under the California Public Records Act. I also regularly interface with community members. My qualifications include years of relationship building with residents and experience participating in community outreach events. I personally conducted the home visits to gather this information for the case studies.

My resume is attached as Exhibit A.

IV. Conclusion

This concludes my testimony.

Exhibit A

Jamie Zweifler-Katz

jbkatz@leadershipcounsel.org

EXPERIENCE

Leadership Counsel for Justice and Accountability
Senior Staff Attorney

Fresno, CA
April 2025-Present

Lead advocacy for the organization the California Public Utilities Commission.

Represent community groups in matters including administrative advocacy, litigation, and negotiating community benefit agreements.

Staff Attorney

October 2020-March 2025

Advocated alongside residents and community groups throughout the San Joaquin Valley and Eastern Coachella Valley. Co-developed legal strategies with residents to achieve their goals.

Led statewide energy policy strategy and advocacy. Built and supported environmental justice coalitions. Coordinated with and trained colleagues to respond to emerging threats and opportunities to ensure residents benefit from and are not harmed by the energy transition, including access to clean, reliable, and affordable energy; ending support for false climate solutions that harm nearby communities; ensuring the needs and perspectives of low income rural communities of color are centered in California climate and energy policy.

Testified at the California State Legislature as an expert on environmental justice and energy policy. Advocated at California state agencies, including the Public Utilities Commission, the Energy Commission, and the Air Resources Board. Successfully applied for a \$200,000 grant to support community advocacy at the California Public Utilities Commission.

Legal Services of Northern California
Staff Attorney

Vallejo, CA
September 2018—September 2020

Met with and advised low-income Solano County residents on a wide range of civil legal matters. Represented clients at administrative hearings. Prepared discovery, drafted trial briefs and demurrers, negotiated unlawful detainer settlements. Drafted and presented public comment before the Vallejo City Council. Presented legal education to community members and community organizations. Conducted legal research in rapidly changing areas of law. Supervised summer law clerks and recent legal graduates. Advised and incorporated community organizations.

UC Davis Aoki Water Justice Clinic
Student

Davis, CA *Clinic*
August 2017—May 2018

Met with client communities throughout California to address water quality concerns. Formed nonprofit corporations to provide clean drinking water to client communities. Researched and drafted legal guides for future clinic students.

Lawyers' Committee for Civil Rights of the San Francisco Bay Area

Economic Justice Law Clerk

San Francisco, CA
June—August 2017

Interviewed entrepreneur clients. Reviewed commercial leases. Drafted letters to landlords on behalf of clients. Facilitated client communication with private attorneys. Presented on California wage and hour law to small business owners. Researched legal issues related to gig economy and asset protection for immigrant business owners.

UC Davis Prison Law Clinic
Clinic Student

Davis, CA
January—May 2017

Conducted interviews with and developed legal strategy with incarcerated client. Answered letters with legal questions from incarcerated people. Conducted legal research on prison conditions and parole board hearings.

Sustainable Economies Law Center
Intern
Volunteer Researcher

Oakland, CA *Legal*
October 2015—December 2015
October 2015 – August 2016

Developed and drafted legal resources on urban agriculture for practitioners and the general public. Investigated alternative tax-exempt statuses for farmers' markets. Provided direct legal services to social entrepreneurs, primarily those from marginalized communities in the East Bay.

ChangeLab Solutions
Legal Intern

Oakland, CA
June—August 2016

Conducted legal research on public health issues. Wrote a memorandum on the role of public health in school discipline reform. Provided technical assistance to local public health departments in California.

Legal Services of Northern California
Housing Law Clinic Volunteer

Sacramento, CA
September 2015—May 2016

Interviewed low-income tenants to ascertain their legal questions, establish relevant facts, and identify potential claims or defenses. Performed spot legal research. Provided legal advice and counsel under attorney supervision.

EDUCATION

University of California at Davis, King Hall School of Law
Juris Doctor

Davis, CA
2015—2018

- National Lawyers Guild, *IL Representative 2015-16; Co-Chair 2016-17*
- Environmental Law Society, *Symposium Committee Member 2015-16; Symposium Co-Chair 2016-17*

Kenyon College
Bachelor of Arts in Literature, minor in Philosophy, with distinction

Gambier, OH
2006—2010

- People Encouraging Agrarian Sustainability, *Facilitator 2009-10*

Exhibit B

Five Case Studies of Orange Cove Residents with Gas Appliances

Authors: Jamie Zweifler-Katz and Desiree Valiante



Submitted to the California Public Utilities Commission

August 29, 2025

Background

In August 2025 I conducted a series of home visits to Orange Cove residents. These visits consisted of asking residents a series of questions about their home, their family, and their gas appliances. The questions were as follows:

1. How long have you been a resident of Orange Cove?
2. How long have you lived in this house?
3. What is your occupation?
4. How many people live in your home? What are their ages?
5. Does anyone in your home have medical conditions affected by air quality?
6. How old is your home?
7. How old are your gas appliances?
8. How often do you use them?
9. When was the last service of your appliances? Can you afford to service your appliances regularly?
10. What type of home do you live in? (Single family house, apartment, mobile home)?
11. Do you rent or own your home?
12. Do existing circumstances prevent you from ventilating your home? (pesticides, wind storms, fire seasons, poor air, heat, etc.)
13. Do you use supplementary heating? (fireplace, heaters, etc)
14. Has your home had any weatherization improvements (windows, insulation, HVAC?)

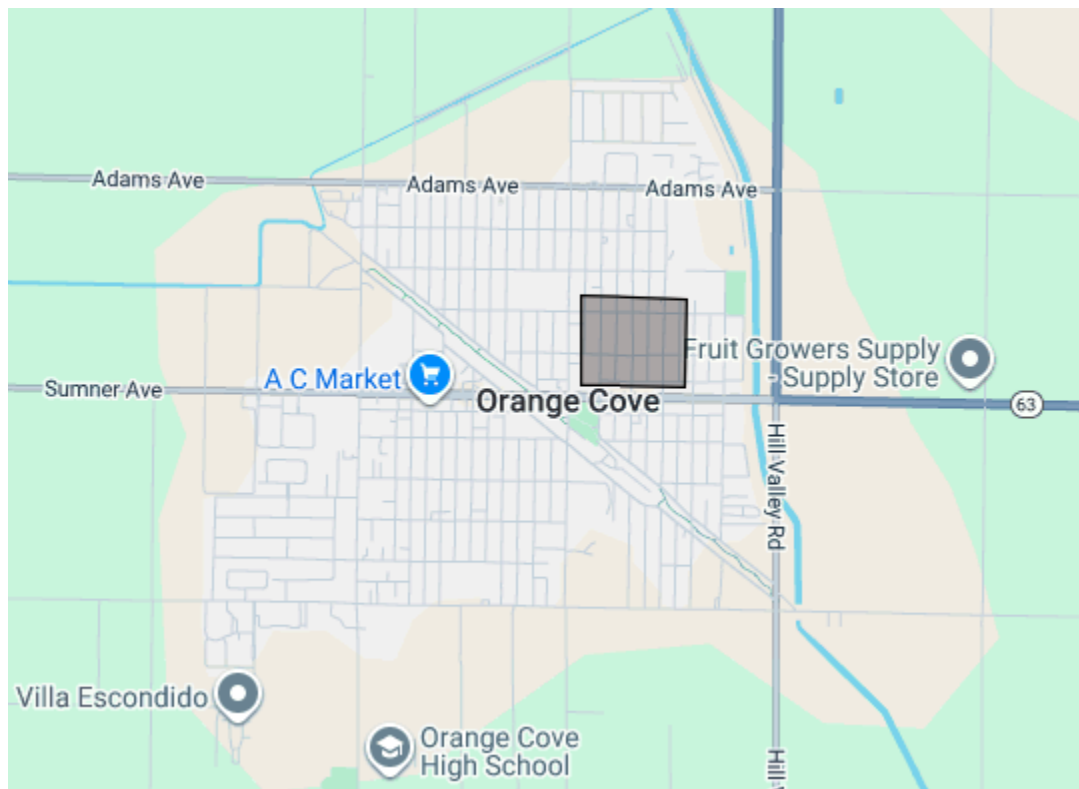
The case studies that follow are based on residents' answers to these questions as well as my personal observations in the homes and, where indicated, simple internet research to confirm the age of homes or serial numbers to determine the age of appliances.

House 1

House 1 was built in 1947 (based on internet research). It is occupied by a family of six with ages ranging from 3 to 56 years old. The family owns the home and have been residents of Orange Cove for almost 30 years. The homeowners work in agriculture.

The gas powered appliances within the home are a stove, water heater, a furnace, and a clothing dryer. The homeowners have never had the appliances serviced. The stove is estimated to be 10 years old. They use the stove every single day, usually 3 times a day. The water heater is 19 years old (based on internet research), and is located in a closet outside of but attached to the home. The wall mounted heater appears to be original to the home. The dryer was estimated to be about 10 years old by the home owner, however the serial number indicates it is 30 years old (based on internet research). They use this appliance mostly on the weekends for several hours a day. The home itself has not been upgraded since this owner moved in. There is no HVAC, thin single paned windows original to the house, the doors are all original, and the furnace used to provide heat is also to when the home was constructed.

Approximate location of House 1:



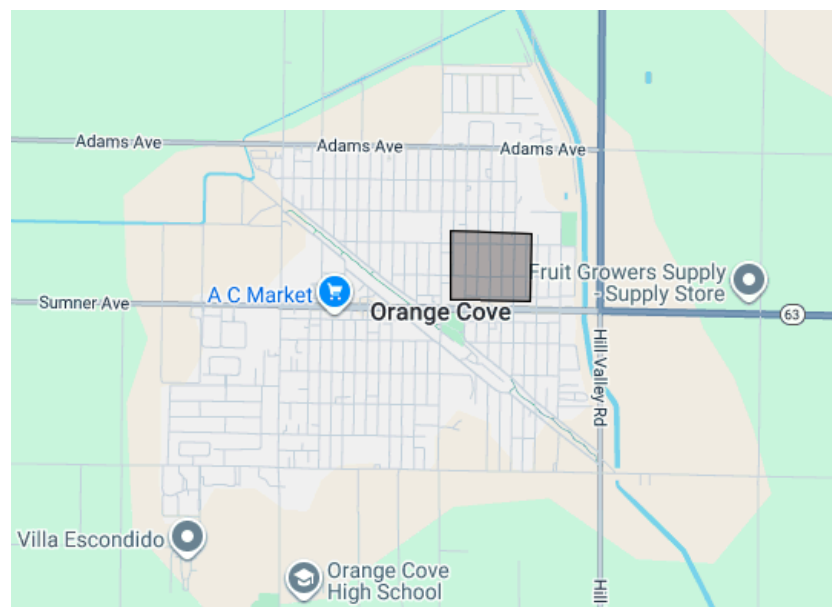
House 2

House 2 was built in 1946 (based on internet research). It is under renovation and will soon be occupied by a family of four with ages ranging from 1 to 34 years old. The family owns the home and have been residents of Orange Cove for almost 30 years. The homeowners work in agriculture.

The gas powered appliances within the home are: a stove, water heater, a furnace, and a clothing dryer. Their current appliances are mostly left from the prior owner and to their knowledge have never received service. They also believe there have not been any updates to the windows, doors, furnace, and there is no HVAC system or hood above the stove. The homeowner estimates the stove is 10 years old, and is used 3 times a day every day. The owner is in the process of installing a stove, which according to the serial number, was made in 2008 (based on internet research). The water heater is estimated to be 10 years old, and is located in a closet outside of but attached to the home. The furnace is original to the house. The dryer in this home is approximately 10 years old.

Family members report allergies which are exacerbated by poor air quality. There are times when the family would like to ventilate their home, but when pesticides are sprayed on the nearby land they do not open any doors or windows as it irritates their allergies and they become more severe.

Approximate location of House 2:



House 3

House 3 is approximately 30 years old. It is occupied by a family of six with ages ranging from 9 to 65 years old. The family rents the home and have been residents of Orange Cove for over 50 years. A stay at home mother runs the house, and her older sister lives with them.

To their knowledge this home has not received any weatherization upgrades after it was constructed. There is no HVAC system in this home. The gas powered appliances within the home are: a stove, water heater, a furnace, and a clothing dryer. The stove in this house is approximately 10 years old, and this family uses it three times a day everyday. Some days it is on and simmering most of the day. The renters estimate that the water heater is 16 years old, but they cannot access it without their landlord. It is located in a closet outside of but attached to the home. The furnace is original to the house and is utilized in winter. Recently this family lost their clothing dryer to a fire. It was approximately 20 years old, gas powered, and caught fire about 2 months ago. Before the fire, this family used the dryer mostly on the weekends. Now they air dry their clothing.

All of the members of the household suffer from severe allergies they believe are related to and exacerbated by the pesticides sprayed onto the nearby agricultural land. Every member of the family is prescribed medication by their doctor to help with the allergies and at times they are still debilitating. Half of this family, the two youngest and the oldest members have asthma.

Approximate location of House 3:



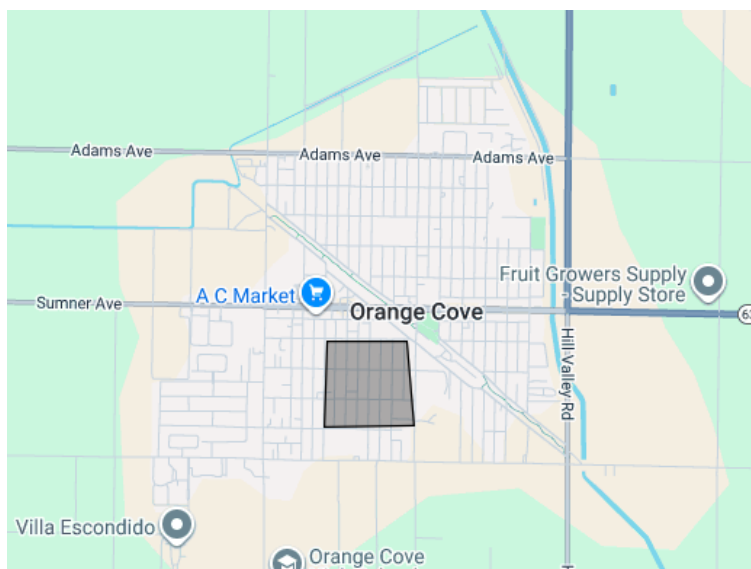
House 4

House 4 was built in 1973 (based on internet research). It is occupied by a family of eight with ages ranging from 16 to 61 years old. The family owns the home and have been residents of Orange Cove for over 50 years. The homeowners work in agriculture.

House 4 has not had any weatherization improvements and there is no HVAC system in this home. The gas powered appliances within the home are: a stove, water heater, a furnace, and a clothing dryer. The previous stove stopped working and they had to replace it approximately 1 year ago. They use the stove every single day, usually 3 times a day. The water heater is at least 25 years old (based on internet research) and is located inside the home in a central closet. It has been here since they moved in, and they are unsure how long it was there before them. The furnace is original to the house. This family uses it frequently during cold winter days. Homeowners purchased a used dryer about 5 years ago to replace theirs when it broke. They usually do at least one load of laundry a day, however on the weekends they tend to use the dryer more. This family has never serviced their appliances within their home.

Of the 8 occupants of this home, 3 (16, 50, 61), have asthma. The remaining 5 family members (21, 25, 38, 40, 49) have serious allergy conditions affected by air quality. When pesticides are sprayed on the nearby agricultural lands it is nearly impossible to ventilate their home due to effects caused by breathing them in. If they were to open their windows/doors it would exacerbate their existing allergies and asthma conditions.

Approximate location of House 4:



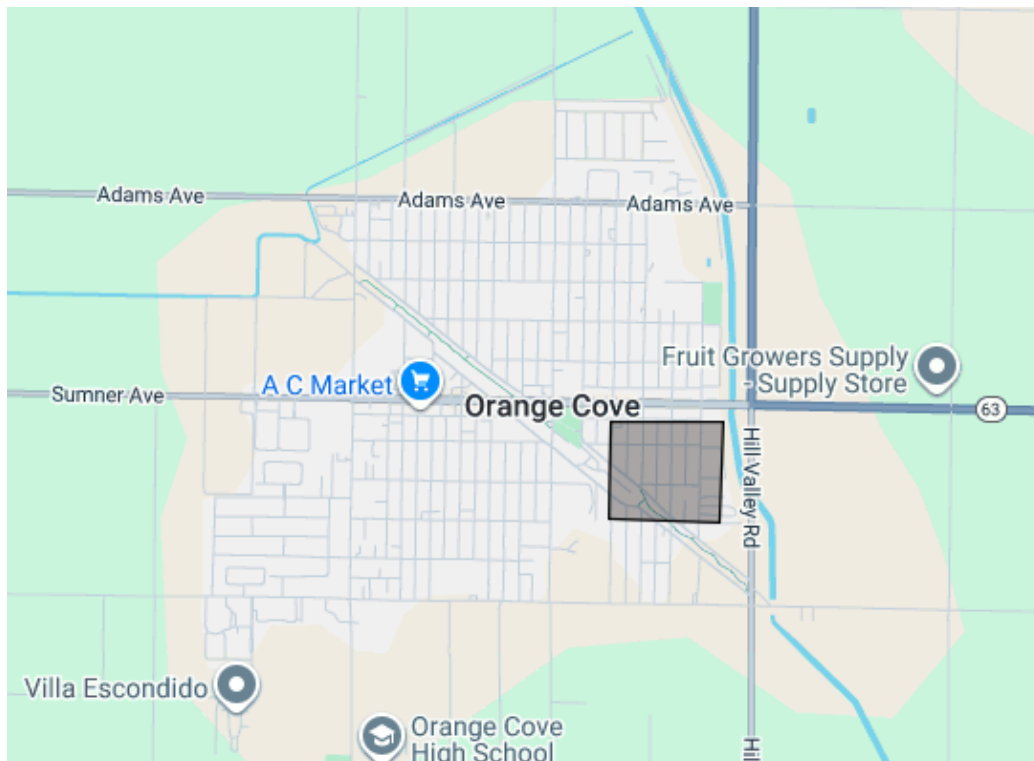
House 5

House 5 was built in 1995 (based on internet research). It is occupied by a family of five, ranging in age from 9 to 47 years old. They have rented the home for 11 years. They have been residents of Orange Cove for 22 years. They work in agriculture.

House 5 has not had any weatherization improvements. The gas powered appliances within the home are: a stove, water heater, and a furnace. The stove is at least 11 years old and was there when they moved in. They use the stove every day. The water heater is 14 years old (based on internet research) and is located behind the house in a closet. The furnace is original to the house. This family has their appliances serviced approximately 6 years ago. They state that they cannot afford to have them served more frequently.

One adult in the home has respiratory allergies. The 9 year old child has respiratory allergies and asthma. Pesticides, wind storms, fire seasons, poor air, heat, and winter weather prevent the family from ventilating the house.

Approximate location of House #5:



Sample Pictures

Below are a collection of pictures of appliances taken during the home visits, including furnaces, stoves, and water heaters. Each of these appliances was in one of the five houses included in the case studies above.

Furnaces:



House 2



House 1



House 5



Stoves:



House 3



House 1



House 4



House 5



House 2

Water heaters:



House 4



House 2



House 1

Exhibit C

California Public Records Act Request
Submitted to the City of Orange Cove
By Leadership Counsel for Justice and Accountability
August 23, 2024



Jamie Zweifler-Katz <jbkatz@leadershipcounsel.org>

Public Records Act request

Jamie Katz <jbkatz@leadershipcounsel.org>
To: ccisneros@cityoforange Cove.com

Fri, Aug 23, 2024 at 4:19 PM

Ms. Cisneros,

Please find attached a Public Records Act request on behalf of Leadership Counsel for Justice and Accountability.

Respectfully,
Jamie Katz (They/She)
Staff Attorney
Leadership Counsel for Justice and Accountability
2210 San Joaquin Street
Fresno, CA 93721



2024-08-23 PRA to City of Orange Cove.pdf
105K



August 23, 2024

Sent via Email [ccisneros@cityoforange Cove.com]

Ms. Cynthia Cisneros
City Clerk
City of Orange Cove
633 6th Street
Orange Cove, CA
93646

RE: Request for Records (Public Records Act)

Dear Ms. Cisneros:

Please accept this as a request for records pursuant to the California Public Records Act submitted to the City of Orange Cove. (Gov. Code § 7920, et seq.) We request that you provide us with copies of the following records:

1. All public records related to any planned or contemplated hydrogen project, including any related solar, water, or other infrastructure, in the City of Orange Cove or its sphere of influence from January 1, 2020 to the present.
2. All public records relating to or constituting communications from January 1, 2020 to the present between the City of Orange Cove and Southern California Gas Company related to hydrogen, including any solar, water, or other infrastructure related to any planned or contemplated hydrogen project in the City of Orange Cove or its sphere of influence.
3. All public records related to or constituting applications and permits in between South Avenue and Parlier Avenue on the north/south boundary and South Anchor Avenue and Jacobs Avenue on the east/west boundary from January 1, 2020 to the present.

For purposes of this request, the term “City of Orange Cove” means the City of Orange Cove and includes the City of Orange Cove’s council members, agents, employees, attorneys, accountants, investigators, consultants, and anyone else acting on the City of Orange Cove’s behalf. In addition, The term “public records” includes any “writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.” (Gov. Code § 7920.520(a).) “Writing” means “any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation... regardless of the manner in which the record has been stored.” (Gov. Code § 7920.545.) This request thus includes, but is not limited to, all letters, memoranda, text messages, social media messages, and/or emails to and from the individuals and/or organizations listed above, and specifically where their name(s) and/or email address(es) appear in the TO, FROM, CC, and/or BCC lines of any letter,

memoranda, and/or email.

The Public Records Act requires a response within ten days. (Gov. Code § 7922.535(a)) If you intend to withhold any documents on the basis of an exemption or privilege, please notify us in your response to this request of the documents you intend to withhold and the basis for their withholding. (Gov. Code § 7922.000) In addition, if you anticipate seeking an extension of time to provide responsive documents, please contact us immediately to discuss options for the City's expedient compliance with this request.

To the extent possible, send all records responsive to this request in PDF format to me at my email address: jbkatz@leadershipcounsel.org. (Gov. Code § 7922.570.) To the extent that records cannot be emailed due to the size of the files, we will provide you with one or more flash drives as necessary. Please notify me prior to making any copies in response to this request.

Thank you for your attention to this matter. Please contact me at jbkatz@leadershipcounsel.org or (559) 369-2790 if you have any questions regarding this request.

Sincerely,

Jamie Katz
Staff Attorney
Leadership Counsel for Justice and Accountability

Exhibit D

**City of Orange Cove's Response to
Leadership Counsel for Justice and Accountability
California Public Records Act Request**

January 6, 2025



Jamie Zweifler-Katz <jbkatz@leadershipcounsel.org>

Public Records Act request

Cynthia Cisneros <CCisneros@cityoforange Cove.com>

Mon, Jan 6, 2025 at 4:22 PM

To: Jamie Katz <jbkatz@leadershipcounsel.org>

Hi Jamie,

Attached please find:

- Resolution 2024-04
- Memo from Code Enforcement

This is all the information I have regarding a Hydrogen Project in Orange Cove. For more information referencing this project, please call So Cal Gas.

Thank you,

Cynthia Cisneros

City Clerk-HR

City of Orange Cove

Ph. 559-626-4488, ext. 213



[Quoted text hidden]

2 attachments

**Resolution 2024-04.pdf**

96K



Memo from Code Enforcement Dept..pdf

73K

RESOLUTION NO. 2024-04 CITY OF ORANGE COVE

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ORANGE COVE
DIRECTING THE CITY OF ORANGE COVE ADMINISTRATION TO WORK
WITH SOCALGAS ON THE CLEAN ENERGY HYDROGEN BLENDING
DEMONSTRATION PROJECT AND AUTHORIZING EXECUTION OF
CONTRACT DOCUMENTS WITH SOCALGAS FOR THE PURPOSE OF
COMPLETING THE PROJECT**

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF ORANGE COVE AS
FOLLOWS:

1. SoCalGas has expressed its intent to construct a Clean Energy Hydrogen Blending Demonstration Project in the City of Orange Cove.
2. The City Council of the City of Orange Cove supports SoCalGas' efforts to construct such project and will work in conjunction with SoCalGas to ensure the project is completed
3. The City Manager is authorized to sign Contract documents related to this project on behalf of the City of Orange Cove, and the City Clerk is authorized to attest to the signature of the individual who signs on behalf of the City of Orange Cove.

CLERKS CERTIFICATION

I, HEREBY CERTIFY, that the foregoing Resolution was passed and adopted by the City Council of the City of Orange Cove at a meeting thereof held on the 27th of March, 2024 by the following vote:

AYES: 4 COUNCIL MEMBERS: Cervantes, Vacio, Rodriguez, Silva

NOES: 0 COUNCIL MEMBERS: None

ABSTAIN: 0 COUNCIL MEMBERS: None

ABSENT: 1 COUNCIL MEMBER: Mayor Pro Tem Garcia

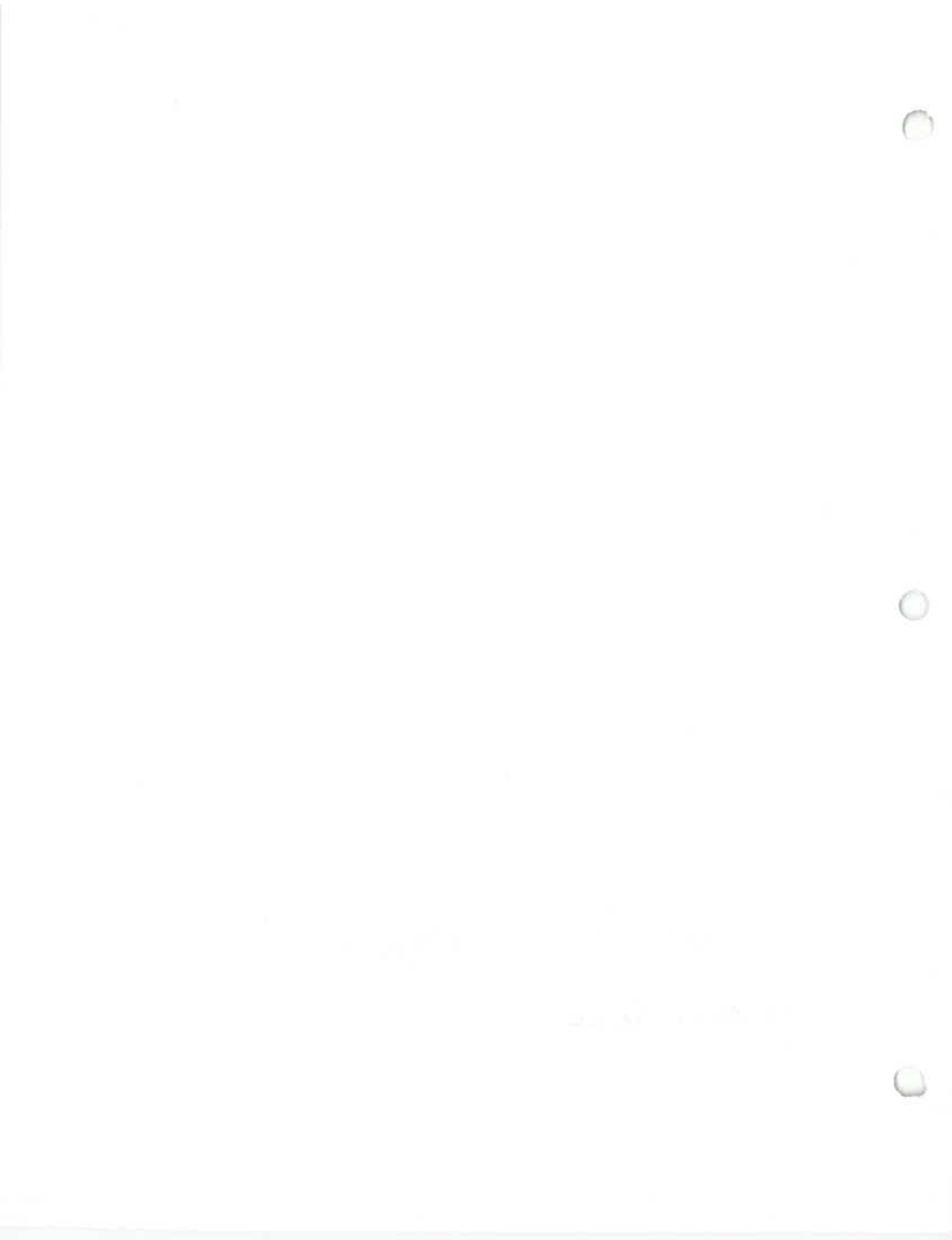

Diana Guerra-Silva, Mayor

APPROVED AS TO FORM

Megan N. Church, City Attorney

ATTEST:

Cynthia Cisneros, City Clerk
City of Orange Cove



Mayor:
Diana Guerra Silva

Mayor Pro Tem:
Gilbert Garcia

City Council Members:
Maria Vacio
Josie Cervantes
Esperanza Rodriguez



Incorporated January 20, 1948

Daniel T. Parra, MPA
Interim City Manager
(559) 626-4488 ext. 214


Financial Consultant
Ellie Velicescu
(559) 626-4488 ext. 216

Municipal City Clerk:
Cynthia Cisneros
(559) 626-4488 ext. 213

633 6th St. Orange Cove, CA 93646 | Phone: (559) 626-4488 | FAX: (559) 626-4653

**PUBLIC RECORD FOR
PROPERTY BETWEEN SOUTH AVENUE AND PARLIER
AVENUE ON THE NORTH/SOUTH BOUNDARY AND
SOUTH ANCHOR AVENUE AND JACOBS AVENUE ON
THE EAST/WEST BOUNDRY FROM JANUARY 01, 2020
TO THE PRESENT**

We have searched our files and found no records of any work done on this property. The property has no developments on it.


Carl Lockridge
Code Enforcement Director

RECEIVED

JAN 6 2025

City Clerk
City of Orange Cove