Docket:	:	A.22-09-006
Exhibit Number	:	CADV-02
Commissioner	:	Darcie L. Houck
Admin. Law Judge	:	Charles Ferguson
Witnesses	:	Kaj Peterson
		Tom Gariffo
		Matthew Taul

PUBLIC ADVOCATES OFFICE
California Public Utilities Commission

Responses of Southern California Gas Company, Southwest Gas Corporation and Pacific Gas & Electric Company to Cal Advocates' Data Requests with Regard to Hydrogen Blending Demonstration Projects

San Francisco, California
November 17, 2025

CAL ADVOCATES EXHIBIT 2

ATTACHMENTS

LIST OF ATTACHMENTS

#	Attachment	Description
1	Cal Advocates-SCG-A2209006-004	Southern California Gas Company's response to Cal Advocates' fourth data request.
2	PUBADV-03-001	Southwest Gas Corporation's response to Cal Advocates' third data request.
3	CalAdvocates_007-Q001	Pacific Gas and Electric Company's response to Cal Advocates' seventh data request.

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Cal Advocates-SCG-A2209006-004

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
CAL ADVOCATES-SCG-A2209006-004
HYDROGEN BLENDING DEMONSTRATION APPLICATION (A.22-09-006)
DATE REQUESTED: October 9, 2025
RESPONSE DUE: October 16, 2025

QUESTION 1:

SoCalGas' Rebuttal Testimony, at page BW-7, speaks to the age and length of "Existing PE Pipe Involved For Proposed Project at UC Irvine", with its earliest polyethelene (PE) pipe segment being installed in 1999.

SoCalGas' response to prior questions about the UCI Project use of new steel pipe stated:

> ""New steel pipe" is being installed within the UCI demonstration in order to create a mixed-material demonstration project. The new steel pipe material installed within the UCI demonstration will be representative of at least the last decade of steel infrastructure and of steel assets anticipated for installation in coming years." SoCalGas response to DR-01 Question 5(a), at 16.

a) What percentage of SoCalGas' distribution polyethene (PE) pipe segments were installed after 1999?

b) What percentage of SoCalGas' distribution polyethene (PE) pipe segments were installed before 1999?

c) What percentage of SoCalGas' distribution main pipeline segments are polyethelene (PE)?

d) What percentage of SoCalGas' distribution main pipeline segments are made of a material other than polyethelene (PE)?

e) What percentage of SoCalGas' distribution steel pipe segments were installed utilizing the "the last decade of steel infrastructure"?

f) What percentage of SoCalGas' distribution steel pipe segments were not installed utilizing the "the last decade of steel infrastructure"?

RESPONSE 1:

a) As reported in the End of Year 2024 PHMSA Distribution Annual Report, 35.16% of SoCalGas's polyethylene medium-pressure mains and services were installed after 1999.
b) As reported in the End of Year 2024 PHMSA Distribution Annual Report, 63.13% of SoCalGas's polyethylene medium-pressure mains and services were installed before 1999.

c) As reported in the End of Year 2024 PHMSA Distribution annual report, 53.93% of SoCalGas's medium-pressure mains are polyethylene.

d) As reported in the End of Year 2024 PHMSA Distribution Annual Report, 46.07% of SoCalGas's medium-pressure mains are made of material other than polyethylene.

e) In this scenario, SoCalGas's reference to "new steel pipe material installed within the UCI demonstration will be representative of at least the last decade of steel infrastructure" is predicated on historical pipeline standards for steel pipe grade and wall thickness. SoCalGas does not actively track this level of detail with regard to its medium pressure distribution system and thus is not able to determine with certainty within the time provided to respond to this data request what percentage of distribution steel pipe segments are representative of the last decade of steel infrastructure based on specific codes and standards. SoCalGas was, however, able to determine the amount of steel pipeline installed within the last decade. As reported in the End of Year 2024 PHMSA Distribution annual report, 0.11% of SoCalGas's steel medium-pressure mains and services were installed between 2015 and 2024.

f) See response to question 1.e. Similarly, as reported in the End of Year 2024 PHMSA Distribution annual report ,99.89% of SoCalGas's steel medium-pressure mains and services were installed before 2015.

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PUBADV-03-001

SOUTHWEST GAS CORPORATION
A.22-09-006
APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), AND SOUTHWEST GAS CORPORATION (U 905 G) TO ESTABLISH HYDROGEN BLENDING DEMONSTRATION PROJECTS
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CALIFORNIA PUBLIC UTILITIES COMMISSION
PUBLIC ADVOCATES OFFICE
PUBADV-03-001
(PUBADV-03-001 THROUGH PUBADV-03-001)

DOCKET NO: A.22-09-006
COMMISSION: CALIFORNIA PUBLIC UTILITIES COMMISSION
DATE OF REQUEST: 10/9/2025

REQUEST NO: PubAdv-03-001

Southwest Gas' Rebuttal Testimony states as follows:

"The subject Truckee Pilot pipeline segment is an existing, in-service distribution main installed between 2003 and 2022. It is representative of the high-density polyethylene (HDPE) that makes up much of Southwest Gas' California distribution system, which is continually assessed under integrity management programs (49 CFR Part 192, Subpart P)." Prepared Rebuttal Testimony of Kevin M. Lang, at 6.

a. What percentage of Southwest Gas' distribution main pipeline segments were installed after 2003?

b. What percentage of Southwest Gas' distribution main pipeline segments were installed prior to 2003?

c. What percentage of Southwest Gas' distribution main pipeline segments are high-density polyethelene (HDPE)?

d. What percentage of Southwest Gas' distribution main pipeline segments are made of a material other than high-density polyethelene (HDPE)?

RESPONDENT: Engineering Staff

RESPONSE:

a. Approximately 42.9% of Southwest Gas' distribution main pipeline mileage within the California territories was installed after 2003, based on facility data extracted from the Company's geographic information system (GIS). An additional 3.5% of pipeline mileage was installed in 2003.

b. Approximately 53.6% of Southwest Gas' distribution main pipeline mileage within the California territories was installed prior to 2003, according to facility data extracted from the Company's GIS records.

c. Approximately 53.8% of Southwest Gas' distribution main pipeline mileage within the California territories consists of high-density polyethylene (HDPE) material, based on facility data from the Company's GIS records.

d. Approximately 46.2% of Southwest Gas' distribution main pipeline mileage within the California territories is composed of non-HDPE materials, including various grades of steel and other legacy plastic materials, per the Company's GIS records.

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CalAdvocates_007-Q001

PACIFIC GAS AND ELECTRIC COMPANY
Hydrogen Blending Demonstration Projects
Application 22-09-006
Data Response

PG&E Data Request No.:	CalAdvocates_007-Q001
PG&E File Name:	HydrogenBlendingDemonstrationProjects_DR_CalAdvocates_007-Q001
Request Date:	October 9, 2025
Requester DR No.:	Cal Advocates-PGE-A2209006-007
Requesting Party:	Public Advocates Office
Requester:	Kaj Peterson/Wayne Parker
Date Sent:	October 13, 2025
PG&E Witness(es):	Danielle Mark – Engineering, Planning and Strategy

QUESTION 001

In Pacific Gas and Electric Company's (PG&E) Prepared Direct Testimony on the Hydrogen Blending Demonstration Project (PG&E Testimony), Chapter 5, at 1:6-7, PG&E identifies its proposed demonstration project as "PG&E's proposed Hydrogen Blending Demonstration Project (Project)."

In PG&E Testimony, Chapter 5, at 11:23-24, PG&E testifies that "Outside the scope of this application, future expansion of the Project may include the following, provided there is no opportunity to leverage existing facilities:"

Thereafter, in PG&E Testimony, Chapter 5, at 11-25 to 12-10, PG&E testifies that the future expansion of the Project may include "Full-Scale Offline Testing Facility", "Laboratory", "Education and Training Facility", and "de-blending area".

a) Please confirm that the "future expansion of the Project" referenced in PG&E Testimony, Chapter 5, at 11:23-24 is the same as, "PG&E's proposed Hydrogen Demonstration Project (Project)".

ANSWER 001

a) No, although the word "Project" referenced in the sentence "future expansion of the Project" in PG&E's Chapter 5 testimony, at 11:23-24, is the same as "PG&E's proposed Hydrogen Blending Demonstration Project (Project)", the future expansion of the Project is not included in PG&E's currently proposed Hydrogen Blending Demonstration Project.

PACIFIC GAS AND ELECTRIC COMPANY
Hydrogen Blending Demonstration Projects
Application 22-09-006
Data Response

PG&E Data Request No.:	CalAdvocates_007-Q002
PG&E File Name:	HydrogenBlendingDemonstrationProjects_DR_CalAdvocates_007-Q002
Request Date:	October 9, 2025
Requester DR No.:	Cal Advocates-PGE-A2209006-007
Requesting Party:	Public Advocates Office
Requester:	Kaj Peterson/Wayne Parker
Date Sent:	October 13, 2025
PG&E Witness(es):	Danielle Mark – Engineering, Planning and Strategy

QUESTION 002

In PG&E's Hydrogen Blending Demonstration Project Rebuttal Testimony (PG&E Rebuttal Testimony), at 4:6-16, PG&E testifies that:

[Cal Advocates] states that, "PG&E transmission pilot goes beyond the scope of D.22-12-057" because the "proposed project is part of a much larger Research Development & Demonstration (RD&D) facility." [citation omitted] PG&E would like to clarify that its proposed RD&D facility is not separate from and apart from the pilot. The pilot *is* the RD&D facility as a whole, which consists of four main parts: (1) the Full-Scale Online Testing Facility in the form of a transmission test loop with testing areas attached, (2) a gas control center facility, (3) a classroom, and (4) a storage warehouse. There is not a separate, standalone facility. These four components are both reasonable and necessary to the pilot.

a) Please confirm whether the "pilot" identified in the quote above is the same as "PG&E's proposed Hydrogen Blending Demonstration Project (Project)" identified in Question 1 above.

b) Please confirm that the "RD&D facility" identified in the quote above is the same as "PG&E's proposed Hydrogen Blending Demonstration Project (Project)" identified in Question 1 above.

c) If the answers to Question 2(a) and 2(b) are "yes," is it true that PG&E could or may expand the Project or RD&D facility in the future to include additional facilities and a de-blending area that is not a part of the current Project (or RD&D facility)?

d) If PG&E does not secure outside funding for the future expansion of the Project (or RD&D facility) as described in PG&E's Testimony, Chapter 5 at 11:23 to 12:10, does PG&E intend to request the Commission authorize its ratepayers fund the future expansion of the Project (or RD&D facility)?

e) If PG&E expands the Project or RD&D facility in the future, will the "four main parts" (the Full-Scale Online Testing Facility, gas control center facility, classroom, and storage warehouse) be a part of the larger RD&D facility once the expansion is completed?

ANSWER 002

a) Yes, the pilot identified in the quote above is the same as “PG&E’s proposed Hydrogen Blending Demonstration Project (Project)” identified in Question 1.

b) Yes, the RD&D facility identified in the quote above is the same as “PG&E’s proposed Hydrogen Blending Demonstration Project (Project)” identified in Question 1.

c) Yes, PG&E may expand the Project or RD&D facility in the future to include additional facilities, such as a de-blending area that is not part of the currently proposed Project (or RD&D facility). However, PG&E is not seeking funding for the expansion in this proceeding.

d) PG&E does not know at this time whether it will seek to expand the Project or RD&D facility at a future date. Because we do not know if we will seek to expand the Project at a future date, we do not know if we will request the Commission to authorize ratepayers to fund such an expansion. If PG&E determines that it should perform these expansions and desires to seek rate recovery for them, PG&E would need to evaluate the proper legal and regulatory mechanisms for seeking rate recovery at that time.

e) Yes, if PG&E expands the Project or RD&D facility in the future, the current “four main parts” (the Full-Scale Online Testing Facility, gas control center facility, classroom, and storage warehouse) will become part of a much larger RD&D facility once the expansion is completed.

PACIFIC GAS AND ELECTRIC COMPANY
Hydrogen Blending Demonstration Projects
Application 22-09-006
Data Response

PG&E Data Request No.:	CalAdvocates_007-Q003
PG&E File Name:	HydrogenBlendingDemonstrationProjects_DR_CalAdvocates_007-Q003
Request Date:	October 9, 2025
Requester DR No.:	Cal Advocates-PGE-A2209006-007
Requesting Party:	Public Advocates Office
Requester:	Kaj Peterson/Wayne Parker
Date Sent:	October 13, 2025
PG&E Witness(es):	Danielle Mark – Engineering, Planning and Strategy

QUESTION 0033

In PG&E Testimony, Chapter 5, at 11:23-24, PG&E testifies that "Outside the scope of this application, future expansion of the Project may include the following, provided there is no opportunity to leverage existing facilities:"

Thereafter, in PG&E Testimony, Chapter 5, at 11-25 to 12-10, PG&E testifies that the future expansion of the Project may include "Full-Scale Offline Testing Facility", "Laboratory", "Education and Training Facility", and "de-blending area".

a) If the future expansion of the Project (which may include "Full-Scale Offline Testing Facility", "Laboratory", "Education and Training Facility", and "de-blending area") is outside the scope of PG&E's application, please explain why PG&E includes the future expansion of the Project and potential additional parts in PG&E's Testimony and how that possible future expansion is relevant to the current proceeding.

ANSWER 0033

a) The testimony that the potential "future expansion" is "outside the scope of this application" was intended to mean that PG&E is not seeking rate recovery for those expansions in the application at this time. It was not intended to suggest that the potential for future expansion was irrelevant.

   For example, PG&E noted the potential future expansion to demonstrate that the current scope of the pilot is limited to the essential purpose of filling knowledge gaps instead of including items that would be desirable, but are not currently necessary. This tends to show the reasonableness of PG&E's rate recovery request.

   In addition, PG&E believes it is worthwhile to note that the current project scope could serve as a foundation for further expansion if it later becomes feasible or necessary. This tends to show that the currently designed pilot has potential value beyond the presently planned tests.