

**SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
LEADERSHIP COUNSEL FOR JUSTICE AND ACCOUNTABILITY (LCJA) DR-01
HYDROGEN BLENDING DEMONSTRATION APPLICATION (A.22-09-006)**
DATE REQUESTED: October 9, 2025
RESPONSE DUE: October 16, 2025

QUESTION 1:

Is Orange Cove a disadvantaged community according to CalEnviroScreen 4.0?

RESPONSE 1:

SoCalGas objects to this request on the grounds it is inconsistent with the Commission's General Discovery Custom and Practice ("Discovery Guidelines"). On October 9, SoCalGas's counsel advised LCJA's counsel that its served discovery included requests for admission that are generally inconsistent with the Discovery Guidelines. SoCalGas additionally indicated if the questions were reframed and provided to SoCalGas the next morning, SoCalGas would deem the requests timely submitted and respond in good faith. This data request followed, with the requests for admission reframed as interrogatories. The Discovery Guidelines, however, provide, "The usual means of discovery on other parties is through "data requests" (i.e., questions or requests for data, information or documents sent electronically or in writing to the party to respond). Depositions are allowed pursuant to Public Utilities Code Section 1794. Commission discovery practice generally does not use formal civil discovery tools, such as requests for admission, interrogatories, etc." SoCalGas additionally objects to this request on the grounds the information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Yes.

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QUESTION 2:

Is NOx a harmful indoor air pollutant that can contribute to and/or exacerbate health impacts, including asthma and other respiratory health challenges?

RESPONSE 2:

SoCalGas objects to this request on the grounds it is inconsistent with the Commission's General Discovery Custom and Practice ("Discovery Guidelines"). On October 9, SoCalGas's counsel advised LCJA's counsel that its served discovery included requests for admission that are generally inconsistent with the Discovery Guidelines. SoCalGas additionally indicated if the questions were reframed and provided to SoCalGas the next morning, SoCalGas would deem the requests timely submitted and respond in good faith. This data request followed, with the requests for admission reframed as interrogatories. The Discovery Guidelines, however, provide, "The usual means of discovery on other parties is through "data requests" (i.e., questions or requests for data, information or documents sent electronically or in writing to the party to respond). Depositions are allowed pursuant to Public Utilities Code Section 1794. Commission discovery practice generally does not use formal civil discovery tools, such as requests for admission, interrogatories, etc." SoCalGas additionally objects to this request on the grounds the information is equally available to the requesting party. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Yes, the California Air Resources Board recognizes NOx as an indoor air pollutant that can contribute to health impacts including asthma and other respiratory challenges.¹

¹ See California Air Resources Board, Nitrogen Dioxide and Health; available at: <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>

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QUESTION 3:

Do homes, businesses, and public buildings in Orange Cove contain appliances of various makes, models, ages, and conditions?

RESPONSE 3:

SoCalGas objects to this request on the grounds it is inconsistent with the Commission's General Discovery Custom and Practice ("Discovery Guidelines"). On October 9, SoCalGas's counsel advised LCJA's counsel that its served discovery included requests for admission that are generally inconsistent with the Discovery Guidelines. SoCalGas additionally indicated if the questions were reframed and provided to SoCalGas the next morning, SoCalGas would deem the requests timely submitted and respond in good faith. This data request followed, with the requests for admission reframed as interrogatories. The Discovery Guidelines, however, provide, "The usual means of discovery on other parties is through "data requests" (i.e., questions or requests for data, information or documents sent electronically or in writing to the party to respond). Depositions are allowed pursuant to Public Utilities Code Section 1794. Commission discovery practice generally does not use formal civil discovery tools, such as requests for admission, interrogatories, etc." SoCalGas further objects to this request on the grounds it calls for speculation as SoCalGas is not aware of all of the appliances in homes, business, and public buildings in Orange Cove. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

SoCalGas expects this to be the case; however, SoCalGas has not conducted a full inventory of appliances in the community to further understand the array of makes, models, ages, or condition.

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QUESTION 4:

Were all of the gas appliances in Orange Cove specifically designed to burn hydrogen?

RESPONSE 4:

SoCalGas objects to this request on the grounds it is inconsistent with the Commission's General Discovery Custom and Practice ("Discovery Guidelines"). On October 9, SoCalGas's counsel advised LCJA's counsel that its served discovery included requests for admission that are generally inconsistent with the Discovery Guidelines. SoCalGas additionally indicated if the questions were reframed and provided to SoCalGas the next morning, SoCalGas would deem the requests timely submitted and respond in good faith. This data request followed, with the requests for admission reframed as interrogatories. The Discovery Guidelines, however, provide, "The usual means of discovery on other parties is through "data requests" (i.e., questions or requests for data, information or documents sent electronically or in writing to the party to respond). Depositions are allowed pursuant to Public Utilities Code Section 1794. Commission discovery practice generally does not use formal civil discovery tools, such as requests for admission, interrogatories, etc." SoCalGas further objects to this request on the grounds it is vague and ambiguous, specifically with respect to the phrase "specifically designed." SoCalGas also objects to this request on the grounds it calls for speculation as SoCalGas is not aware of "all of the gas appliances in Orange Cove." Furthermore, SoCalGas objects to this request on the grounds it is unintelligible and misunderstands SoCalGas's proposal for the project, which is for a blend up to 5% hydrogen by volume in natural gas. SoCalGas responds as follows:

SoCalGas has not taken a full inventory of "all of the gas appliances in Orange Cove," and moreover SoCalGas has proposed a hydrogen blend up to 5% by volume in natural gas, with natural gas as the primary fuel. Accordingly, SoCalGas cannot opine on what all of these appliances were designed to burn, but would assume that a majority of the appliances connected to the natural gas system were intended for use with natural gas. Further, UC Riverside's Hydrogen Blending Impacts study found that hydrogen blended in natural gas in the range of 5%- 20% as acceptable, without significant impact on safety and operation of end-use appliances.²

² UC Riverside, Hydrogen Blending Impacts Study, at 8; available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M493/K760/493760600.PDF>

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QUESTION 5:

Does hydrogen have the potential to embrittle steel pipeline materials?

RESPONSE 5:

SoCalGas objects to this request on the grounds it is inconsistent with the Commission's General Discovery Custom and Practice ("Discovery Guidelines"). On October 9, SoCalGas's counsel advised LCJA's counsel that its served discovery included requests for admission that are generally inconsistent with the Discovery Guidelines. SoCalGas additionally indicated if the questions were reframed and provided to SoCalGas the next morning, SoCalGas would deem the requests timely submitted and respond in good faith. This data request followed, with the requests for admission reframed as interrogatories. The Discovery Guidelines, however, provide, "The usual means of discovery on other parties is through "data requests" (i.e., questions or requests for data, information or documents sent electronically or in writing to the party to respond). Depositions are allowed pursuant to Public Utilities Code Section 1794. Commission discovery practice generally does not use formal civil discovery tools, such as requests for admission, interrogatories, etc." SoCalGas further objects to this request on the grounds it is overly broad, vague and ambiguous, and outside the scope of this proceeding as determined in the June 12, 2025 Assigned Commissioner's Scoping Memo and Ruling and, accordingly, this request is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

UC Riverside's Hydrogen Blending Impacts Study recognizes that hydrogen has the potential to embrittle steel pipeline materials. However, it finds that the impacts of hydrogen embrittlement are dependent on several factors including operating conditions such as pressure, temperature, and cycle loading.³ With the parameters commonly seen in medium pressure distribution systems and the proposed demonstration projects(<60 PSI), and a modest blend percentage of up to 5-20% hydrogen by volume, research suggests that there would not be significant impacts expected from the effects of embrittlement.⁴

³ UC Riverside: Hydrogen Blending Impacts Study; at 7; available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M493/K760/493760600.PDF>

⁴ *Southern California Gas Company (SoCalGas), Response to Appendix B of Assigned Commissioner's Scoping Memo and Ruling, Application (A.) 22-09-006, August 11, 2025, at 32*

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QUESTION 6:

Is Aldyl-A polyethylene pipe present in the Orange Cove gas pipeline distribution system?

RESPONSE 6:

SoCalGas objects to this request on the grounds it is inconsistent with the Commission's General Discovery Custom and Practice ("Discovery Guidelines"). On October 9, SoCalGas's counsel advised LCJA's counsel that its served discovery included requests for admission that are generally inconsistent with the Discovery Guidelines. SoCalGas additionally indicated if the questions were reframed and provided to SoCalGas the next morning, SoCalGas would deem the requests timely submitted and respond in good faith. This data request followed, with the requests for admission reframed as interrogatories. The Discovery Guidelines, however, provide, "The usual means of discovery on other parties is through "data requests" (i.e., questions or requests for data, information or documents sent electronically or in writing to the party to respond). Depositions are allowed pursuant to Public Utilities Code Section 1794. Commission discovery practice generally does not use formal civil discovery tools, such as requests for admission, interrogatories, etc." Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Yes.

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QUESTION 7:

Does the material in Attachments 22.b and 22.c of Part of Attachment 26 to Sierra Club's testimony¹ constitute the entirety of the written communication between SoCalGas and Orange Cove regarding the Proposed Project before November 14, 2022?

RESPONSE 7:

The material provided in Attachment 26, Question 22.b discusses presentation materials utilized with elected officials, Orange Cove City Council, or the general public, not necessarily written communication. There is no written communication between SoCalGas and Orange Cove officials or the general public before November 14, 2022.

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QUESTION 8:

Regarding the Rebuttal Testimony of Chris Gilbride, and in reference to each activity related to the Proposed Project listed in the timeline on pages CG-3 and CG-4 and the list of additional activities on CG-5 and CG-6, please answer the following questions:

- a. What information did SoCalGas provide, including the contents of any written materials, to residents of Orange Cove during each of the activities?
- b. Did SoCalGas provide any materials or information regarding risks to health or property related to the Proposed Project?
- c. What feedback did SoCalGas receive during each of the activities, including but not limited to any opposition, negative feedback, or concerns?
- d. Describe any and all modifications to the Proposed Project that SoCalGas made to incorporate the feedback described in request (c) above, and any other

RESPONSE 8:

SoCalGas objects to this request on the grounds it is vague and ambiguous. The referenced timeline includes activities for the UCI Project as well as the Orange Cove Project. SoCalGas understands LCJA's request to pertain only to the Orange Cove Project and responds accordingly.

A. As part of the engagement activities in Orange Cove, SoCalGas developed a set of materials designed to be both educational and transparent. The materials aimed to inform the community about the current status of the proposed project and SoCalGas' role in the demonstration efforts. They were used to update the dedicated webpage, fact sheets, door hangers, social media content, and presentation materials (shared regulatory background, project overview, timeline, safety, and operations). In addition, SoCalGas engaged with local media to further support outreach efforts. Communication materials are updated periodically based on community feedback and questions. Some of these materials can be found on socalgas.com/orangecove

B. See response A.

C. SoCalGas has consistently engaged with Orange Cove residents and local stakeholders and sought to incorporate feedback as appropriate. Collaborating with these groups has created meaningful opportunities to deepen public engagement and participation. Community feedback has generally been positive or neutral. Many residents have expressed appreciation for the communications received from SoCalGas, while others, though not actively interested in the project, have requested to be kept informed as it progresses.

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Some residents raised questions about the pipeline infrastructure in Orange Cove and how ready it would be for the hydrogen blend. Others wanted to know about the safety protocols that will be implemented for the proposed project. Additionally, residents are interested to know whether the project would generate job opportunities for Orange Cove residents. Furthermore, some residents have raised questions about not being able to opt out of the project or their appliances not being compatible with hydrogen-blended gas, potentially requiring residents to pay out of pocket.

Orange Cove residents have expressed a desire for more information about the proposed project. In response, SoCalGas will continue leveraging all available communication channels to inform and educate the public, including collaborating with the city's outreach channels. As part of SoCalGas' ongoing engagement efforts in the city, and in alignment with feedback received during the recent CPUC Public Participation Hearings, SoCalGas is planning to participate in a Community Open House at the end of October. This event will provide an opportunity for residents to ask questions and receive updates directly from SoCalGas representatives. Subject matter experts will be available to answer questions in both English and Spanish, promoting accessibility and transparency for community members.

D. SoCalGas did not receive any specific recommendations from community members regarding the proposed project design at the activities described in the testimony, although non-specific suggestions were made at the public participation hearings on August 25, 2025. As SoCalGas has been conducting stakeholder engagement activities since that testimony was submitted, and SoCalGas heard significant feedback at the public participation hearings, SoCalGas may incorporate feedback to propose modifications to the proposed Orange Cove Project once it is authorized and the project proceeds to Phase 1 engineering design activities. Modifications may also be made in response to stakeholder feedback in Phase 2 operations.

Feedback was provided on stakeholder engagement activities prompting SoCalGas to enhance its outreach efforts in response. The company remains committed to maintaining open lines of communication with customers and is actively working to increase engagement within the community. SoCalGas welcomes ongoing feedback from the community and will continually remain open to considering input on the project's design and responding as appropriate.

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QUESTION 9:

Regarding the Rebuttal Testimony of Chris Gilbride at CG-5, what did SoCalGas do to facilitate the visit to and tours of the “H2 Innovation Experience” in Downey, California? In responding to this request, detail any funding provided to facilitate the visit and tours, including but not limited to any gifts or other funding provided to Orange Cove, Orange Cove city council members, and other stakeholders to facilitate the visit

RESPONSE 9:

SoCalGas offered to provide a tour of its H2 Innovation Experience to a delegation of officials from Orange Cove and stakeholders from Fresno County. SoCalGas worked with Orange Cove officials to coordinate the date and agenda of the tour. SoCalGas did not provide funding to tour participants for transportation or accommodations for the tour. However, food and refreshments were provided for participants during the tour.

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QUESTION 10:

Describe any and all gifts and contributions You made to Orange Cove city council members or their political campaigns or associated political action committees from January 1, 2023 to October 9, 2025.

RESPONSE 10:

SoCalGas has not made any political contributions to Orange Cove city council members or to their political campaigns. On February 12, 2025, SoCalGas provided two council members breakfast as part of a routine engagement.

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QUESTION 11:

Regarding the Rebuttal Testimony of Chris Gilbride at CG-8, the witness states that SoCalGas intends to “encourage participation in existing customer assistance and energy efficiency programs prior to and during the demonstration so aging and faulty appliances can be replaced with safe, functional, and more energy efficient ones,” explaining that “a predominant number of customers may qualify for SoCalGas’s Energy Savings Assistance Program (ESA Program), which may be able to subsidize or fully replace existing appliances before the demonstration commences.”

- i. Is the ESA Program application available online at <https://eetc.socalgas.com/OnlineApp/#enrollment/?programId=333> also accessible in Spanish? If so, please provide the link.
- ii. Are households only eligible for the ESA Program to repair or replace appliances if the household is at or below 250% of the federal poverty level?
- iii. Does the ESA Program include repair or replacement of stoves or ranges?
- iv. Does the ESA Program only include repair or replacement of water heaters and furnaces if the existing appliance is “deemed inoperable or hazardous?”
 1. If not, please detail the other circumstances that justify repair or replacement under the ESA Program.
- v. If an Orange Cove resident is not eligible for the ESA program, has SoCalGas identified alternative means of repairing or replacing appliances?

If yes, please specify these alternative means and to whom they are available.

RESPONSE 11:

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- i) The online interest form can be found at the webpage listed. Currently, this online interest form is not offered in Spanish.
- ii) Households may be eligible for services either by being at or below the income levels mentioned above or if the applicant or another permanent household member receives benefits from any number of approved public assistance programs.
- iii) No.
- iv) The ESA Program can replace operating furnaces and water heaters based on certain criteria including age and/or efficiency rating of the appliance and household gas usage during winter months.
- v) If a resident is not eligible for ESA Program services, they may also be eligible to participate in existing Energy Efficiency Programs, which may help offset a portion of the capital cost to replace appliances.

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QUESTION 12:

Rebuttal Testimony of Chris Gilbride at CG-4 states, “when So-CalGas began looking for partners to host potential hydrogen blending projects, the City of Orange Cove reached out to SoCalGas to consider developing a project in this community . . .” Please provide the timing, location(s), and circumstances under which Orange Cove “reached out” to SoCalGas, including but not limited to who was present and the venue(s).

RESPONSE 12:

The city manager and two councilmembers from the city of Orange Cove verbally communicated their interest to be considered for a hydrogen blending project to SoCalGas' Vice President of Communications, Local Government, and Community Affairs, and the Director of Regional Public Affairs at the National Association of Latino Elected Officials Annual Conference in July 2023. The city mentioned in the conversation that they heard SoCalGas was looking for a potential site for a demonstration project. The city officials asked SoCalGas to visit Orange Cove to meet with other stakeholders and discuss a potential project, which SoCalGas agreed to.

Following the conversation, SoCalGas conducted a technical analysis, and identified Orange Cove as an ideal candidate for a hydrogen blending project based on feasibility criteria. A meeting was held on August 4, 2023, at the Orange Cove Community Center, between city officials and staff, their legislative representative, business associations, SoCalGas leaders, and members of SoCalGas's project team. During the meeting, SoCalGas provided information about its application, proposed demonstration project, and its objectives. City and regional representatives asked questions about the application and project and discussed the potential benefits for the community and region.

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QUESTION 13:

The Rebuttal Testimony of Blaine Waymire at BW-i states, “[t]hese projects were developed in alignment with CPUC Decision D.22-12-057, which calls for real-world demonstrations to inform the development of a statewide hydrogen injection standard.” CPUC Decision D.22-12-057 recommends that “real-world pilot projects should be performed in either a closed system or in a mock-up of a real-world system using typical equipment and materials found in California gas infrastructure.” (emphasis added).

- a. Please explain whether SoCalGas considered a pilot project in a mock-up of a real world system, and the reasons SoCalGas instead pursued the Proposed Project.
- b. Please provide all documents regarding SoCalGas’s choice to develop the Proposed Project as a real-world pilot.

RESPONSE 13:

- a. SoCalGas pursued the proposed project in alignment with D.22-12-057 requirements for a closed-system project, while also including live system segments to best accurately collect data under real-world conditions. SoCalGas has already performed blending in mock-ups of a real world system through its [H2] Innovation Experience⁵, Living Lab RD&D Project⁶, and blending at SoCalGas’s centralized training facility (also known as Situation City)⁷.
- b. SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent it seeks “all documents,” particularly given the short turnaround time ordered by the ALJ for responding to discovery (namely, responding to discovery served by October 9 by October 16, 2025).

⁵ See [H2] Innovation Experience; available at <https://www.socalgas.com/sustainability/hydrogen/h2home>

⁶ See NYSEARCH: Hydrogen-Natural Gas Living Lab; available at https://www.nysearch.org/tech-brief_12_12-2022.php;

⁷ See SoCalGas Among First in the Nation to Test Hydrogen Blending in Real-World Infrastructure and Appliances in Closed Loop System; available at: <https://www.socalgas.com/newsroom/press-release/socalgas-among-first-in-the-nation-to-test-hydrogen-blending-in-real-world>

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QUESTION 14:

The Rebuttal Testimony of Blaine Waymire at BW-7–BW-8 lists the approximate total length of existing steel pipe by year installed. Please detail all materials and their locations in the pipeline in Orange Cove, including but not limited to the type and strength of steel present in the existing pipe.

RESPONSE 14:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks "all materials and their locations in the pipeline in Orange Cove, including but not limited to the type and strength of the steel present in the existing pipe," particularly given the short turnaround time ordered by the ALJ for responding to discovery (namely, responding to discovery served by October 9 by October 16, 2025) and the likelihood of this discovery leading to admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

As noted in the question, SoCalGas has already provided the approximate total length and presence of various materials in the Orange Cove project area. SoCalGas installs pipeline in accordance with federal, state and industry codes and, as such, does not actively track the specific strength of steel materials installed in its medium pressure distribution system. This information would be obtained based on codes and standards at the time of installation.

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QUESTION 15:

The Rebuttal Testimony of Blaine Waymire at BW-10-11 and BW 35-36 explains that leak surveys would be “conducted on a monthly basis for the project at UC Irvine, and on a quarterly basis for the project in Orange Cove,” further explaining that monthly leak inspections at UC Irvine were proposed “due to the hydrogen blend percentage ranging from 5-20%,” whereas the hydrogen blend in Orange Cove will ramp up from 0.1% to 5% throughout the course of the Project. Please clarify whether the lower percentage of hydrogen in Orange Cove is the only reason for less frequent leak inspections. Why are surveys to be conducted less frequently in Orange Cove than in UC Irvine?

RESPONSE 15:

SoCalGas is proposing less frequent leak surveys in Orange Cove than UC Irvine due to the lower blend percentage of hydrogen proposed in the demonstration project. Further, there are electronic pressure monitoring (EPM) systems in the Orange Cove demonstration pipeline system.⁸ EPMs help detect fluctuations in pressure in real time that may indicate the presence of a leak. There are no EPMs present in the exact pipeline area of the proposed UC Irvine project. Further, as detailed in Rebuttal Testimony, the amount of distribution pipeline involved in the demonstration played a role in determining the frequency of leak survey.⁹

⁸ *Southern California Gas Company (SoCalGas), Response to Cal Advocates Data Request No. 002 (Orange Cove), Application (A.) 22-09-006, July 21, 2025*, at pp. 17-18; see also Prepared Rebuttal Testimony of Blaine Waymire on behalf of SoCalGas, *A.22-09-006, September 2025*, at p. BW-37.

⁹ Prepared rebuttal Testimony of Blaine Waymire on Behalf of Southern California Gas Company at BW-37

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QUESTION 16:

The Rebuttal Testimony of Blaine Waymire at BW-21 states, “California, particularly the South Coast Air Quality Management District and San Joaquin Valley Air Pollution Control District, have very strict emissions limits for stationary combustion equipment, most notably for NOx emissions.” Please provide the citation for the relevant San Joaquin Valley Air Pollution Control District regulations regarding the aforementioned strict emissions limits.

RESPONSE 16:

Air District Rule	Appliance Type	Year Rule Amended	NOx Limit* (nanograms/Joule)
San Joaquin Valley APCD 4905	Residential Furnace	March 21, 2024	14
San Joaquin Valley APCD Rule 4902	Residential Water Heater	March 19, 2009	10
San Joaquin Valley APCD Rule 4902	Instantaneous Water Heater	March 19, 2009	14
San Joaquin Valley APCD Rule 4902	Pool Heater	March 19, 2009	40

* NOx limit as of October 2025

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QUESTION 17:

The Rebuttal Testimony of Blaine Waymire at BW-22 notes that “SoCalGas intends to perform emissions monitoring in end use appliances, which will be determined based on a comprehensive customer survey.”

- a. If customers do not respond to or otherwise consent to this survey, has SoCalGas identified alternative means of monitoring NOx emissions in end use appliances?
- b. Would renters be able to participate in emissions monitoring in end use appliances without landlord consent? If yes, please detail whether/how SoCalGas intends to facilitate emissions monitoring for renters.

RESPONSE 17:

- a. SoCalGas has discussed with at least one resident who expressed willingness to perform emissions monitoring in their residence. As outlined in Chapter 2 Testimony, SoCalGas will develop a detailed data collection plan that will be finalized alongside an independent third party.¹⁰ SoCalGas has not yet developed its detailed data collection plan with an independent third party. SoCalGas expects the detailed data collection plan will further detail contingency options if no customers respond to the survey.
- b. SoCalGas cannot opine on whether renters would be able to participate in emissions monitoring without landlord consent as SoCalGas is not familiar with the rental agreements that may be relevant, nor has a detailed data collection plan yet been developed.

¹⁰ Prepared Direct Testimony of Blaine Waymire on behalf of SoCalGas (SoCalGas’s Hydrogen Blending Demonstration - Open System Project) (Chapter 2) at 24.

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RESPONSE DUE: October 16, 2025

QUESTION 18:

The Rebuttal Testimony of Blaine Waymire at BW-35 states that “[u]pon authorization of the project, SoCalGas will create detailed engineering designs in accordance with existing codes and standards that promote safety . . .” Does SoCalGas currently possess the detailed engineering designs that would promote project safety? If yes, please provide these designs.

RESPONSE 18:

No. The project has not yet been authorized.

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LEADERSHIP COUNSEL FOR JUSTICE AND ACCOUNTABILITY (LCJA) DR-01
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QUESTION 19:

The rebuttal testimony of Blaine Waymire at BW-12 states that SoCalGas plans to establish a baseline leak rate of zero before beginning the demonstration.

- a. What is the historical frequency of leaks per mile per year for Orange Cove prior to blending?
- b. Does SoCalGas intend to evaluate the leakage rate after each nominal increase in hydrogen concentration? Why or why not?
- c. Does SoCalGas intend to evaluate the leakage rate after the conclusion of the pilot to determine if the rate of leaks or leak complaints increased throughout the life of the project? Why or why not?

RESPONSE 19:

- a. SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome to the extent it does not include a timeframe. Subject to the foregoing objections, SoCalGas responds as follows. SoCalGas does not track frequency of leaks on a per mile per year basis for specific pipeline areas. SoCalGas provides the following leak history on a per year basis since January 1, 2020, across the approximately 20 miles of pipeline infrastructure in Orange Cove:

Year	Leaks Detected
2020	3
2022	1
2023	1
2024	2

- b. SoCalGas interprets the term “leakage rate” in the context of the question to mean leaks identified. Yes, SoCalGas will perform leak surveys at the nominal blend percentage increases to identify leaks. The quarterly leak inspection is also intended to align with blend percentage increases as described in testimony.¹¹
- c. SoCalGas understands the term “leakage rate” in the context of the question to mean leaks identified. In this scenario, yes. SoCalGas describes in Chapter 2 testimony that “At the end

¹¹ Prepared Direct Testimony of Blaine Waymire on Behalf of Southern California Gas Company (Chapter 2, Open System Project) at 14

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of the data collection period and hydrogen blending has concluded, leak surveys will be performed to verify no additional leaks have developed."¹²

¹² *Id.*