

CPUC Docket No. 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

**Orange Cove United and Leadership Counsel for Justice and Accountability
Data Request OCU-SCG-01**

To:

Avisha Patel on behalf of Southern California Gas Company (SoCalGas),
APatel@socalgas.com

Ismael Bautista, Jr. on behalf of SoCalGas, ibautista@socalgas.com

Francisco Santa Cruz on behalf of SoCalGas, FSantaCruz@socalgas.com

From:

Michael Claiborne on behalf of Orange Cove United (OCU) and Leadership Counsel for Justice and Accountability (LCJA), mclaiborne@leadershipcounsel.org

Jamie Zweifler-Katz on behalf of OCU and LCJA, jbkatz@leadershipcounsel.org

Date Sent: October 9, 2025

Response Due: October 16, 2025

Please provide a response to the following Data Requests (OCU-SCG-01) propounded by OCU and LCJA no later than October 16, 2025 via email.

Please provide all email responses to the individuals representing OCU and LCJA listed above. Responses via postal mail can only be sent to Michael Claiborne:

Michael Claiborne
Leadership Counsel for Justice and Accountability
2210 San Joaquin Street
Sacramento, CA 95815
mclaiborne@leadershipcounsel.org

This data request seeks information relating to A.22-09-006, the Application of SoCalGas, SDG&E, and Southwest Gas to Establish Hydrogen Blending Demonstration Projects. OCU and LCJA reserve the right to submit further data requests.

GENERAL INSTRUCTIONS

The following general instructions apply to all data requests propounded by OCU and LCJA on the SoCalGas in this proceeding.

1. As to any data request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate data request.
2. Any objection to a data request should clearly indicate to which part or portion of the data request the objection is directed.
3. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.
4. If, in answering any of these data requests, there is deemed to be any ambiguity in interpreting either the data request or a definition or instruction applicable thereto, promptly contact Michael Claiborne to obtain a clarification.
5. Responses to these data requests should be transmitted as they become available.

DEFINITIONS

- A. The terms "SoCalGas" and "You" are used to refer to Southern California Gas Company and any and all of its respective present and former shareholders, owners, officers, directors, managing agents, employees, agents, assigns, subsidiaries, consultants, attorneys, officials, and any and all other persons acting on its behalf.
- B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these data requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these data requests any information or documents which might otherwise be considered to be beyond their scope.

E. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.

F. The terms “relate to,” “concern,” and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these data requests.

G. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

H. The term “Orange Cove” means the City of Orange Cove, California.

I. The term “Proposed Project” refers to the proposed hydrogen blending project in the Orange Cove.

J. The term “NOx” refers to nitrous oxide.

OCU/LCJA FIRST SET OF DATA REQUESTS

1. Admit each of the following. For each response that is not an unqualified admission, state all facts and documents upon which You base your response.
 - a. Orange Cove is a disadvantaged community according to CalEnviroScreen 4.0.
 - b. NOx is a harmful indoor air pollutant that contributes to and/or exacerbates health impacts, including asthma and other respiratory health challenges.
 - c. Homes, businesses, and public buildings in Orange Cove contain appliances of various makes, models, ages, and conditions.

- d. Not all of the gas appliances in Orange Cove were specifically designed to burn hydrogen.
 - e. The presence of hydrogen has the potential to embrittle steel pipeline materials.
 - f. Aldyl-A polyethylene pipe is present in the Orange Cove gas pipeline distribution system.
 - g. The material in Attachments 22.b and 22.c of Part of Attachment 26 to Sierra Club's testimony¹ constitutes the entirety of the written communication between SoCalGas and Orange Cove regarding the Proposed Project before November 14, 2022.
2. 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, 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 ways in which SoCalGas has incorporated feedback into the Proposed Project.
3. 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.
4. 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.

¹ Available at <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2209006/8461/578127031.pdf>.

5. 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.” Please answer all of the following requests, and for each response that is not an unqualified admission, state all facts and documents upon which You base your response.
 - i. Admit that the ESA Program application available online at <https://eetc.socalgas.com/OnlineApp/#enrollment/?programId=333> is not accessible in Spanish.
 - ii. Admit that households are 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. Admit that the ESA Program does not repair or replace stoves or ranges.
 - iv. Admit that the ESA Program will only repair or replace water heaters and furnaces if the existing appliance is “deemed inoperable or hazardous.”
 - v. Admit that if an Orange Cove resident is not eligible for the ESA program, SoCalGas has not identified alternative means of repairing or replacing appliances.
6. 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).
7. 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.
8. 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.
 - a. If SoCalGas does not have the information needed to answer this question, admit that SoCalGas does not have a thorough inventory of the aforementioned materials and their locations in Orange Cove.
9. 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?
10. Rebuttal Testimony of Blaine Waymire at BW-22, states, “research suggests that hydrogen blends up to 20% will actually create a reduction or steady state presence of NOx rather than an increase in standard appliances,” citing to Glanville, P. et al. Impact of Hydrogen/Natural Gas Blends on Partially Premixed Combustion Equipment: NOx Emission and Operational Performance. *Energies* 2022, 15, 1706 (the “Glanville Study”). Please answer all of the following requests, and for each response that is not an unqualified admission, state all facts and documents upon which You base your response.
 - a. Admit that the Glanville Study was the basis for reaching the above conclusion.
 - b. Admit that the Glanville Study also shows real-world field-sampled data in addition to data derived from laboratory experiments.
 - c. Admit that in the field-sampled data in the Glanville Study, NOx emissions increased in two of the four water heaters tested.

- d. Admit that in the field-sampled data in the Glanville Study, NOx emissions increased in three of the four furnaces tested.
 - e. Admit that in the field-sampled data in the Glanville Study, NOx emissions increased in one of ranges tested.
11. The Rebuttal Testimony of Blaine Waymire at BW-19 states “[o]ne cannot assume negative impacts from hydrogen blends on a material that has not yet been reviewed in literature.” Admit that SoCalGas has not provided any studies on the impacts of hydrogen blends on Aldyl-A pipeline materials.
12. 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.
13. 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. Admit that if customers do not respond to or otherwise consent to this survey, SoCalGas has not identified alternative means of monitoring NOx emissions in end use appliances.
 - b. Admit that renters would be unable to participate in emissions monitoring in end use appliances without landlord consent.
14. 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 . . .” Admit that SoCalGas does not currently possess the detailed engineering designs that would promote project safety.
15. 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?
 - a. Does SoCalGas intend to evaluate the leakage rate after each nominal increase in hydrogen concentration? Why or why not?

- b. 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?