

Docket	:	<u>A.25-10-008</u>
Exhibit Number	:	_____
Commissioner	:	<u>J. Reynolds</u>
Admin. Law Judge	:	<u>C. Watts-Zagha</u>
Pubic Advocates	:	_____
Project Mgr.	:	<u>Chris Myers</u>
Public Advocates	:	<u>Thomas Gariffo</u>
Witnesses	:	<u>Bridget Horan</u> <u>Ryan Condensa</u>



**PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**PREPARED TESTIMONY
ON
APPLICATION OF SOUTHERN CALIFORNIA
GAS COMPANY (U 904 G)
PROPOSING WOODY BIOMASS
PILOT PROJECT**

San Francisco, California
March 13, 2026

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1 This testimony presents analysis by the Public Advocates Office at the California
2 Public Utilities Commission (Cal Advocates) concerning Application (A.) 25-10-008,
3 *Application of Southern California Gas Company (U 904 G) Proposing Woody Biomass*
4 *Pilot Project* (Application).

5 In Decision (D.) 22-02-025, the California Public Utilities Commission
6 (Commission) ordered Pacific Gas and Electric Company (PG&E) and Southern
7 California Gas Company (SoCalGas) to each file an application by July 1, 2023
8 proposing at least one woody biomass gasification project focused on conversion of
9 woody biomass to biomethane.¹ The Commission directed the Joint Utilities² to
10 collectively set aside \$40 million from their 2022 Greenhouse Gas (GHG) Cap-and-Trade
11 allocated allowance auction proceeds to be used by PG&E and SoCalGas for the pilot
12 projects.³ The Commission allocated SoCalGas up to \$19.704 million of the collective
13 \$40 million Cap-and-Trade allowance proceeds to use toward its woody biomass pilot
14 project.⁴ In D.24-01-060, the Commission enacted a correction to D.22-02-025, changing
15 text of Ordering Paragraph (OP) 43 from “These pilot projects shall include the
16 procurement of bio-SNG...” to “Southern California Gas Company and Pacific Gas and
17 Electric Company may propose to procure bio-Synthetic Natural Gas from these pilots.”⁵

18 On June 30, 2023, SoCalGas filed A.23-06-024 pursuant to D.22-02-025.⁶
19 A.23-06-024 sought Commission approval for a woody biomass gasification project
20 developed by San Joaquin Renewables (SJR).⁷ On April 12, 2024, SoCalGas filed a

¹ Decision (D.) 22-02-025, *Decision Implementing Senate Bill 1440 Biomethane Procurement Program*, issued February 25, 2022, Ordering Paragraph (OP) 43 at 67.

² The “Joint Utilities” are PG&E, SoCalGas, San Diego Gas & Electric Company, and Southwest Gas Corporation.

³ D.22-02-025, OP 43 at 68.

⁴ D.22-02-025, OP 44 at 69.

⁵ D.24-01-060, *Order Correcting Errors*, issued January 26, 2024, at 1-2.

⁶ Application (A.)23-06-024, *Application of Southern California Gas Company (U 904 G) Proposing Approval of Woody Biomass Pilot Project* (A.23-06-024), filed June 30, 2023.

⁷ A.23-06-024 at 2.

1 Motion for Voluntary Dismissal of the Application due to SJR’s withdrawal from the
2 project.⁸ On December 19, 2024, the Commission issued D.24-12-032, which granted
3 SoCalGas’ motion for dismissal and required it to either return the \$19.704 million to
4 ratepayers with interest or file a new application for a woody biomass gasification project
5 by October 15, 2025.⁹ SoCalGas filed A.25-10-008 consistent with D.24-12-032 on
6 October 15, 2025.¹⁰

7 Thomas Gariffo serves as Cal Advocates’ project coordinator in this review and is
8 responsible for the overall coordination in the preparation of this testimony. The
9 witnesses’ prepared qualifications and testimony declarations are contained in Appendix
10 A of this report.

11

Chapter #	Description	Witness
1	Consistency with Commission Requirements	Horan, Condensa
2	Cap-and-Trade Funding Compliance	Gariffo

12

⁸ A.23-06-024, *Motion of Southern California Gas Company (U 904 G) for Voluntary Dismissal of Application*, filed April 12, 2024, at 1.

⁹ D.24-12-032, *Decision Granting Southern California Gas Company’s Request for Voluntary Dismissal of Application Proposing Approval of Woody Biomass Pilot Project*, issued December 19, 2024, OP 2 at 10-11.

¹⁰ Application (A.) 25-10-008, *Application of Southern California Gas Company (U 904 G) Proposing Woody Biomass Pilot Project (Application)*, filed October 15, 2025.

1 **CHAPTER 1 : CONSISTENCY WITH THE COMMISSION REQUIREMENTS**
2 **FOR APPROVAL OF WOODY BIOMASS PILOT PROJECT**

3 **(Witnesses: Bridget Horan, Ryan Condensa)**

4 **I. INTRODUCTION**

5 This chapter focuses on whether SoCalGas’ request to use Cap-and-Trade
6 allowance proceeds for its proposed woody biomass pilot project (Project) is consistent
7 with the requirements in D.22-02-025 and D.24-12-032. SoCalGas selected West
8 Biofuels LLC (WBF) to build, own, and operate the Project’s facility (WBF facility).
9 The Project proposes to demonstrate the production of bio-synthetic natural gas (Bio-
10 SNG) from agricultural waste through gasification and methanation processes, followed
11 by its injection into the SoCalGas pipeline system.¹¹ The biomethane generated at the
12 WBF facility will be transported by truck to SoCalGas’s decanter and pipeline receipt
13 facility, located 60 miles away,¹² where it will subsequently be injected into the
14 SoCalGas pipeline network.¹³ According to SoCalGas’s direct testimony, once the
15 biomethane enters the interconnection point, it may be marketed for various end-uses.¹⁴
16 SoCalGas provides the following illustration showing the primary components of its
17 Project in the Figure below.

¹¹ *Corrected Revised Prepared Direct Testimony of James Lucas and Dr. Matthew D. Summers on Behalf of Southern California Gas Company* (SoCalGas Chapter 2 Testimony) at JLMS-1.

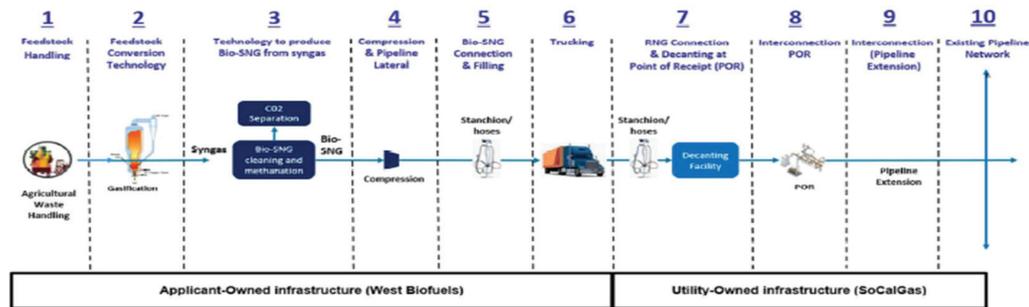
¹² A.25-10-008, *SoCalGas’s Response to ALJ Ruling Seeking Additional Information* (SoCalGas Response to ALJ’s Ruling), filed January 7, 2026, Attachment A.

¹³ SoCalGas Chapter 2 Testimony at JLMS-8.

¹⁴ SoCalGas Chapter 2 Testimony at JLMS-8.

1 **Figure 1-1: Diagram of Project Split into Lanes 1 Through 10¹⁵**

Below is an illustration of the proposed SB 1440 Pilot Project’s primary components:



2
3 SoCalGas proposes to allocate \$9.966 million (\$8.223 million in direct costs and
4 \$1.743 million in indirect costs) towards Lanes 7-9, which is SoCalGas’ infrastructure.¹⁶
5 The costs associated with the Utility-Owned Infrastructure in Lane 7, Lane 8, and Lane 9
6 are forecasted to be \$1,419,967; \$7,626,329; and \$919,923, respectively.¹⁷ SoCalGas
7 also requests that any funds remaining after Lanes 7-9 be used to offset Lane 4 of the
8 Project,¹⁸ which is a part of WBF’s facility. SoCalGas requests to use any further
9 remaining allowance proceeds for Lanes 3 and 5 of the Project, which are also a part of
10 WBF’s facility and operations.¹⁹

11 **II. D.22-02-025 AND D.24-12-032 WOODY BIOMASS PILOT PROJECT**
12 **CONDITIONS.**

13 SoCalGas must satisfy the Commission’s conditions established in D.22-02-025
14 and reaffirmed in D.24-12-032:

- 15 • The project may focus on either forest or agricultural waste, as best
16 serves its interests and the interests of customers;

¹⁵ Application at 7.

¹⁶ SoCalGas Chapter 2 Testimony at JLMS-7 and JLMS-18; Attachment 4, SoCalGas Response to Cal Advocates-SCG-A2510008-001 Question 6, Excel spreadsheet “Lanes 7-8-9 Cost Breakdown Draft.xlsx,” Tab “Overview.”

¹⁷ Attachment 4, SoCalGas Response to Cal Advocates-SCG-A2510008-001 Question 6, Excel spreadsheet “Lanes 7-8-9 Cost Breakdown Draft.xlsx,” Tab “Overview.”

¹⁸ SoCalGas Chapter 2 Testimony at JLMS-18; Application at 7.

¹⁹ SoCalGas Chapter 2 Testimony at JLMS-18; Application at 7.

- 1 • The project should coordinate such gasification projects and strategic
2 placement of the pilot projects with local and state authorities, including
3 the Department of Conservation;
- 4 • The project costs must include pipeline extensions to the pilot facilities;
- 5 • The pipeline extensions should facilitate future potential extensions for
6 additional projects;
- 7 • The pilots should propose methods for using carbon dioxide in Carbon
8 Capture, Utilization, and Storage (CCUS) projects rather than venting to
9 the atmosphere; and
- 10 • The projects must study and report fugitive methane, pollutant, and
11 particulate matter emissions and emissions reduction or elimination
12 methods in the gasification or pyrolysis process, the methanation
13 process, and pipeline infrastructure.²⁰

14 **III. SOCALGAS’S PROJECT DOES NOT SATISFY THE D.22-02-025 AND**
15 **D.24-12-032 REQUIREMENTS TO INCLUDE PIPELINE EXTENSIONS**
16 **TO THE PILOT FACILITIES.**

17 The Commission ordered SoCalGas to include pipeline extensions to the pilot
18 facilities.²¹ SoCalGas does not satisfy this requirement because it does not demonstrate
19 direct pipeline connections or extensions from the WBF facility to SoCalGas’s facilities.
20 Instead, SoCalGas states that WBF will transport biomethane by truck from the WBF to
21 SoCalGas’s facilities, a distance of sixty (60) miles away.²²

22 In response to Cal Advocates’ data request, SoCalGas provided high-level site
23 maps for the proposed WBF Bio-SNG Facility located in Kerman, California (see Figure
24 1-2 below) and the proposed SoCalGas Point of Receipt (POR) in Visalia, California (see
25 Figure 1-3 below).²³ The figures highlight the lack of direct pipeline connection between
26 the WBF and SoCalGas facilities. Instead, the WBF facility (Figure 1-2) contains a Bio-
27 CNG Truck Fill station at which trucks would receive the Bio-Compressed Natural Gas

²⁰ D.22-02-025, OP 43 at 67-68; D.24-12-032 at OP 2(b) at 10-11.

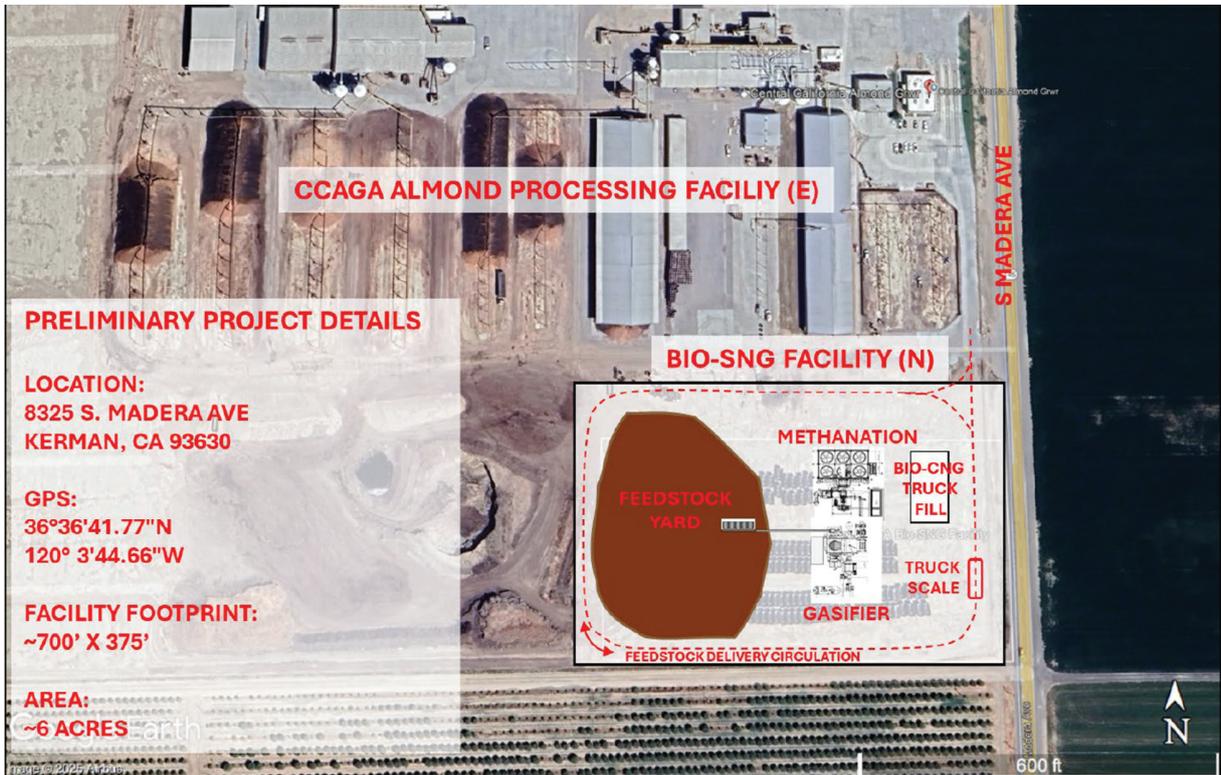
²¹ D.22-02-025, OP 43 at 68; D.24-12-032 at OP 2(b) at 10.

²² SoCalGas Response to ALJ’s Ruling, Attachment A.

²³ Attachment 1, SoCalGas Responses to Cal Advocates-SCG-A2510008-001 Questions 2-5 and 8-11, at 4 and 6.

1 (CNG) for transportation to the SoCalGas facility, depositing the fuel in the Decanter
2 Station shown in Figure 1-3.

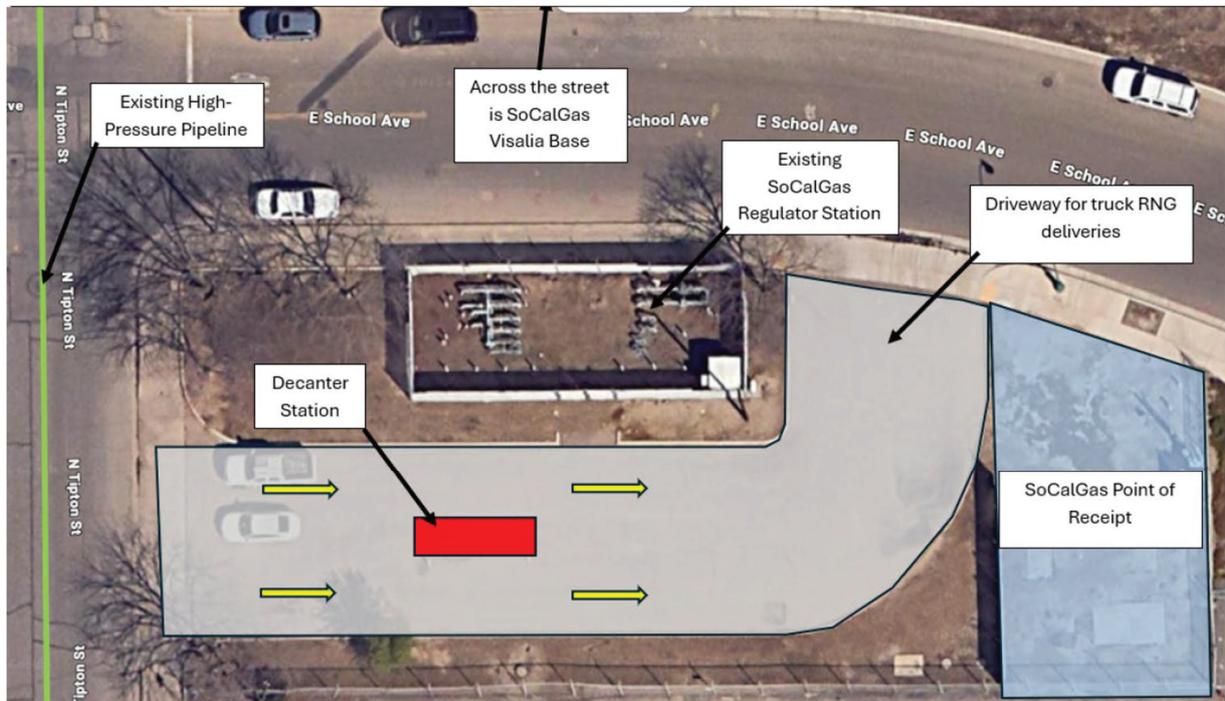
3 **Figure 1-2: Proposed WBF Site Location Located Adjacent to Central California**
4 **Almond Growers Association (CCAGA) Processing Facility.²⁴**



²⁴ Attachment 1, SoCalGas Responses to Cal Advocates-SCG-A2510008-001 Questions 2-5 and 8-11, at 4.

1

Figure 1-3: Proposed SoCalGas POR Site Location²⁵



2

3

4

5

6

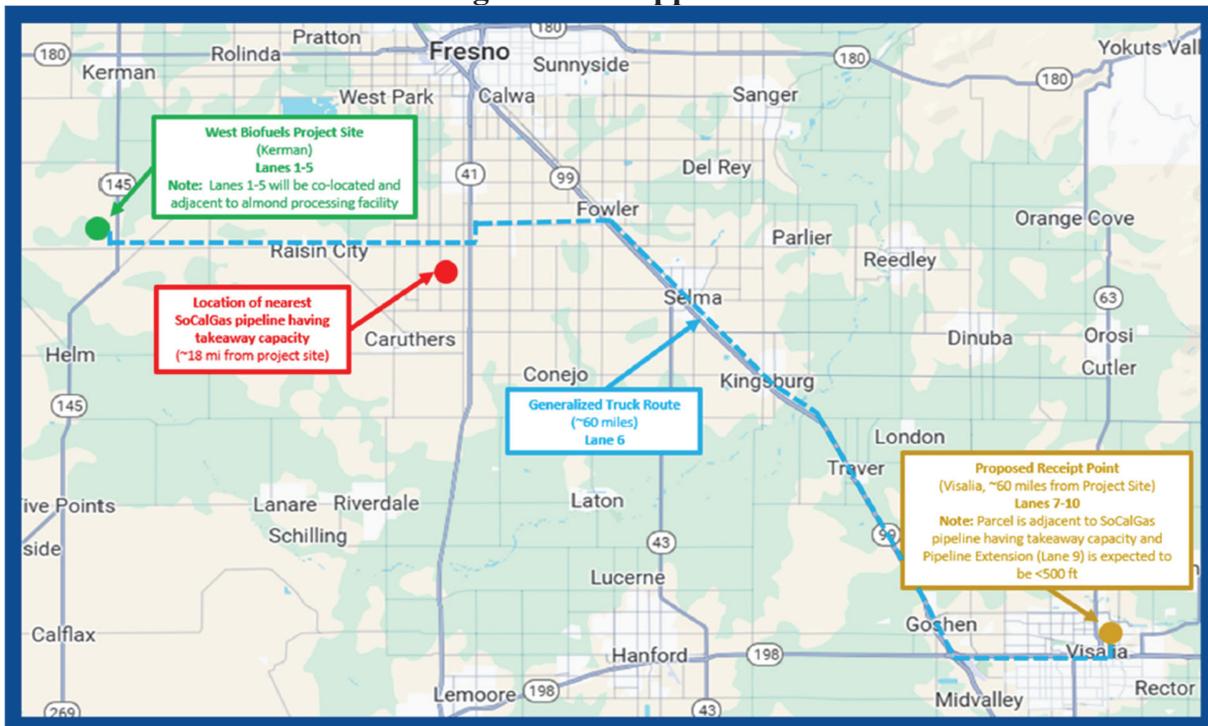
7

Further, in SoCalGas’s *Response to ALJ Ruling Seeking Additional Information*, SoCalGas provides a generalized truck route for the proposed Lane 6 that highlights the approximately 60 miles of distance between the WBF facility (Lane 1 through Lane 5) and the proposed SoCalGas POR (Lane 7 through Lane 9), shown in Figure 1-4 below.²⁶

²⁵ Attachment 1, SoCalGas Responses to Cal Advocates-SCG-A2510008-001 Questions 2-5 and 8-11, at 6.

²⁶ SoCalGas’s Response to ALJ’s Ruling, Attachment A.

1
2
**Figure 1-4: Map/Diagram of the Infrastructure Illustrated
on Page 7 of the Application.²⁷**



5 As shown in the figure above, the WBF facility and SoCalGas’s infrastructure are
6 located approximately 60 miles apart from one another. SoCalGas states WBF will truck
7 the Bio-SNG from the WBF facility to the SoCalGas POR (see Lane 6 in Figure 1-4
8 above).²⁸ Thus, the information SoCalGas provides shows that the Project does not
9 include a pipeline extension *to the WBF facility*. Therefore, the Project fails to comply
10 with D.22-02-025 and D.24-12-032, which requires that “[t]he project cost shall include
11 pipeline extensions to the pilot facility.”²⁹

²⁷ SoCalGas’s Response to ALJ’s Ruling, Attachment A.

²⁸ Application at 7.

²⁹ D.22-02-025, OP 43 at 68. See also, D.24-12-032 at 10.

1 **CHAPTER 2 CAP-AND-TRADE FUNDING COMPLIANCE**

2 **(Witness: Thomas Gariffo)**

3 **I. INTRODUCTION**

4 D.22-02-025 set forth the requirements that SoCalGas must satisfy for approval of
5 its Project. Among these requirements, SoCalGas must demonstrate that its Project
6 satisfies all applicable California Air Resource Board (CARB) regulations because the
7 Commission determined that “[t]his one-time redirect of allocated allowance auction
8 proceeds must comply with all applicable CARB regulations.”³⁰ In D.25-05-003, the
9 Commission denied PG&E’s woody biomass pilot project for failure to comply with the
10 CARB regulations.³¹ There, the Commission stated that “[t]he minimum set of
11 applicable CARB regulations include 17 CCR §§ 95893(d)(3), 95893(d)(5), 95893(d)(8),
12 95893(e)(4)(A), and 95893(e)(4)(B).”³² Among these, Section 95893(d)(3) is most
13 relevant to the current application for compliance purposes.³³

14 Section 95893(d)(3) requires that Cap-and-Trade auction proceeds obtained by
15 natural gas suppliers (e.g., PG&E) be used for the primary benefit of retail natural gas
16 ratepayers.³⁴ Based on the information provided in SoCalGas’ application, testimony,
17 and discovery responses, SoCalGas does not demonstrate that its Project complies with
18 these CARB requirements for use of Cap-and-Trade auction proceeds.

³⁰ D.22-02-025 at 46.

³¹ D.25-05-003, *Decision Deny PG&E Woody Biomass Pilot Project Application*, issued May 21, 2025, at 12.

³² D.25-05-003 at 6.

³³ 17 California Code of Regulations (CCR) § 95893(d)(5) requires natural gas suppliers to demonstrate expected GHG emissions reductions, pursuant to section 95893(e)(4)(B). Section 95893(d)(8) specifies that funds must be used within 10 years, and section 95893(e)(4)(A) requires that the natural gas suppliers include in their annual report to the Executive Officer a description of the use and amount of the proceeds, including how it benefits ratepayers. Cal Advocates reviewed the Application for compliance with section 95893(e)(4)(B), which requires that the annual report include an estimation of the GHG emissions reductions from the use of the proceeds calculated using specific criteria, and has no position at this time.

³⁴ 17 CCR § 95893(d)(3).

1 **II. COMPLIANCE WITH SECTION 95893(d)(3)**

2 Section 95893(d)(3) defines limits on using Cap-and-Trade allowance proceeds.
3 To use these proceeds for the woody biomass projects, a natural gas supplier must
4 demonstrate that the use is “for the primary benefit of retail natural gas ratepayers of each
5 natural gas supplier... and may not be used for the benefit of entities or persons other
6 than such ratepayers.”³⁵ SoCalGas does not demonstrate that its ratepayers are the
7 primary beneficiaries of the Project for the reasons stated below. Additionally,
8 “[a]llocated allowance auction proceeds must be used to reduce greenhouse gas
9 emissions or returned to ratepayers.”³⁶ SoCalGas has not shown that the estimated
10 emissions reductions are valid.

11 **A. SoCalGas does not demonstrate that its Project will**
12 **primarily benefit SoCalGas’ ratepayers.**

13 Per Section 95893(d)(3), Cap-and-Trade allowance proceeds must be used both to
14 reduce GHG emissions and primarily benefit SoCalGas’ ratepayers. Therefore,
15 SoCalGas must not only show that its Project reduces GHG emissions, but that the
16 Project will also primarily benefit SoCalGas’ ratepayers. SoCalGas does not claim any
17 primary or direct benefits will go to its ratepayers: its two primary justifications for the
18 Project are that “[using] woody biomass for gasification can play a pivotal role in helping
19 California meet its climate goals,”³⁷ and that the Project will “demonstrate and provide
20 significant data regarding emissions from agriculture wood waste while injecting
21 biomethane into the SoCalGas pipeline network.”³⁸ SoCalGas does not provide evidence
22 that its Project will produce these general benefits, let alone result in direct benefits to
23 SoCalGas’ ratepayers. This is because SoCalGas does not provide evidence to show that
24 SoCalGas or any other entity will procure, or has committed to procuring, the biomethane

³⁵ 17 CCR § 95893(d)(3).

³⁶ 17 CCR § 95893(d)(3).

³⁷ *Prepared Direct Testimony of Nathaniel Taylor on Behalf of Southern California Gas Company* (SoCalGas Chapter 1 Testimony) at NT-4.

³⁸ SoCalGas Chapter 1 Testimony at NT-7.

1 produced from the Project.³⁹ As of the writing of this testimony, SoCalGas maintains
2 that “WBF has not determined the end use for the biomethane.”⁴⁰ As such, there is no
3 guarantee that SoCalGas’ ratepayers will receive the biomethane, or be the primary
4 benefiter, from the Project.

5 **B. Potential GHG reductions from the Project are**
6 **questionable.**

7 Per Section 95893(d)(3), Cap-and-Trade allowance proceeds must be used to
8 reduce GHG emissions. SoCalGas estimates its Project will have emissions reductions of
9 “-18.9 gCO₂e/MJ and -104 gCO₂e/MJ for the cases without and with CCS,
10 respectively.”⁴¹ SoCalGas does not demonstrate that the GHG reductions associated with
11 Project are certain. The staff proposal that initially recommended the pyrolysis pilot
12 projects noted “California’s limited experience with pipeline-injected Bio-SNG.”⁴² In
13 addition to the pilots, the staff proposal recommended “a study of constituents found in
14 various sources of Bio-SNG” to assess its potential impacts to human health.⁴³ SoCalGas
15 “acknowledges that woody biomass pilot projects involve nascent technology...”⁴⁴
16 Furthermore, SoCalGas claims to know of “no operating projects in the United States that
17 convert woody biomass to biomethane using gasification besides demonstration or small-
18 scale projects,”⁴⁵ and that knowledge of the technologies “is evolving, requiring long-
19 term operation and studies for large-scale deployment...”⁴⁶ Thus, SoCalGas does not

³⁹ D.24-01-060 revised D.22-02-025 OP 43 to remove the procurement requirement from the projects.

⁴⁰ Attachment 1, SoCalGas Responses to Cal Advocates-SCG-A2510008-001 Questions 2-5 and 8-11, at 2.

⁴¹ Application at 6.

⁴² R.13-02-008, *Administrative Law Judge’s Ruling Directing Parties to File Comments on Phase 4A Staff Proposal and Related Questions*, Attachment 1 *R.13-02-008 Phase 4A Staff Proposal* (Phase 4A Staff Proposal), filed June 3, 2021, at 50, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M386/K579/386579735.PDF>.

⁴³ Phase 4A Staff Proposal at 50.

⁴⁴ Application at 3.

⁴⁵ SoCalGas Chapter 1 Testimony at NT-6.

⁴⁶ SoCalGas Chapter 1 Testimony at NT-6.

- 1 present evidence to show there is practical knowledge of the GHG reductions achieved
- 2 by pyrolysis-derived biomethane at a utility scale.
- 3 This concludes Cal Advocates prepared testimony.

APPENDIX A

Qualifications of Witnesses

1 **QUALIFICATIONS AND PREPARED TESTIMONY**
2 **OF**
3 **BRIDGET HORAN**

4 **Q.1 Please state your name and address.**

5 A.1 Bridget Horan, PhD., 320 West 4th St., Suite 500 Los Angeles, CA 90013.

6 **Q.2 By whom are you employed and what is your job title?**

7 A.2 Bridget Horan has been employed with the Public Advocates Office at the
8 California Public Utilities Commission since November 2019.

9 **Q.3 Please describe your educational and professional experience.**

10 A.3 I hold a doctorate degree (Ph.D.) in Organizational Leadership from the University
11 of Chicago. Additionally, I possess an MBA from the University of Pepperdine
12 and a BSBM and Project Management Certificate (PMP) from the University of
13 California, Irvine (UCI). I was awarded a Certificate of Completion in the Art of
14 Executive Leadership from Harvard University. I also carry more than 30 years of
15 experience in the utility industry, including employment with Southern California
16 Edison in various roles (Regional Public Affairs Senior Manager; Revenue
17 Services Supervisor; Distribution Planner; and Customer Service Supervisor);
18 Verizon Wireless (Executive Relations Team Managing Analyst and Customer
19 Operations Supervisor), and small business owner with several master agreement
20 contracts with Community Choice Aggregates (CCAs), state (Department of
21 Justice), federal (U.S. White House and U. S. Securities Exchange Commission
22 [SEC]), and county (Los Angeles Registrar Recorder’s Office) agencies. In
23 addition to 10 plus years of experience in the legal industry working for the
24 California Superior Court (Los Angeles County) as a Supervising Deputy Clerk of
25 the Court.

26 **Q.4 What is your area of responsibility in this proceeding?**

27 A.4 I co-authored Chapter 1 of this testimony.

28 **Q.5 Does that complete your prepared testimony?**

29 A.5 Yes.

1 **QUALIFICATIONS AND PREPARED TESTIMONY**

2 **OF**

3 **THOMAS GARIFFO**

4 **Q.1 Please state your name and address.**

5 A.1 My name is Thomas Gariffo. My business address is 505 Van Ness Avenue, San
6 Francisco, California.

7 **Q.2 By whom are you employed and in what capacity?**

8 A.2 I am employed by the Public Advocates Office of the California Public Utilities
9 Commission as a Public Utilities Regulatory Analyst in the Electric Planning and
10 Policy Branch.

11 **Q.3 Briefly describe your educational background and work experience.**

12 A.3 I have a Master of Public Policy degree from the Luskin School of Public Affairs
13 at the University of California, Los Angeles. I also have a Bachelor of Arts degree
14 in Political Science with a minor in Public Policy from the University of
15 California, Berkeley. I have worked as a greenhouse gas policy subject matter
16 expert in the Climate Change Initiatives section of the Public Advocates Office for
17 ten years, along with providing analysis for policies in proceedings regarding
18 transportation electrification, Low Carbon Fuel Standards (LCFS), the Electric
19 Program Investment Charge (EPIC), California’s Renewable Portfolio Standards
20 (RPS), climate change adaptation and biofuels.

21 **Q.4 What is your area of responsibility in this proceeding?**

22 A.4 I am responsible for Chapter 2 regarding compliance with Cap-and-Trade
23 regulations.

24 **Q.5 Does that complete your testimony?**

25 A.5 Yes, it does.

APPENDIX B

Supporting Attachments

ATTACHMENT 1

SoCalGas Responses to Cal_Advocates-SCG-A2510008-001 Questions
2 through 5 and 8

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
Cal Advocates-SCG-A2510008-001
Woody Biomass Pilot Project application (A.25-10-008)
DATE REQUESTED: December 8, 2025
RESPONSE DUE: December 22, 2025

QUESTION 1:

SoCalGas presents the GREET analysis for the proposed pilot project in Table 1 (p. JL-15), Table 2 (p. JL-16), Table 3 (p. JL-17), and Attachment 1 of Prepared Direct Testimony of James Lucas. Provide the full life-cycle GREET model for the proposed pilot project in Excel format. The Excel spreadsheet should include, but not be limited to, active cells and formulas for the following information:

- a. Baseline carbon intensity and criteria pollutant biomass types, base case disposal methods, and Bio-SNG use case carbon intensity and criteria pollutants with and without carbon capture and storage (CSS).

- b. The methodology used to express baseline carbon intensity and criteria pollutant emissions on a basis of potential megajoule of biosynthetic natural gas (Bio-SNG) production.

- c. Delineated calculations by the production steps.

- d. Well-to-wheel (WTW) carbon intensity for compressed Bio-SNG fuel (Bio-CNG).

- e. The sources and assumptions used to determine the biogenic CO₂ credit of -55.0 gCO₂e/MJ assigned.

- f. Document the sources of data, emission factors, and other assumptions, including but not limited to any source testing, permits, manufacturer certifications, technical reports, or models used to support the analysis.

RESPONSE 1:

For questions 1, 6, and 7, SoCalGas will need an extension to respond by January 9, 2026. We have been diligently working on gathering responsive data, but the holidays have interfered with our efforts with relevant people out on vacation.

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
Cal Advocates-SCG-A2510008-001
Woody Biomass Pilot Project application (A.25-10-008)
DATE REQUESTED: December 8, 2025
RESPONSE DUE: December 22, 2025

QUESTION 2:

Provide any agreements West Biofuels (“WBF”) has made with SoCalGas regarding the vehicles that will be used in the production of Bio-SNG/Bio-CNG and the transport of Bio- CNG between the WBF and SoCalGas facilities, pursuant to OP 38 of D.22-02-025.

RESPONSE 2:

SoCalGas and WBF have not entered into any agreements regarding the vehicles to be used for producing BioSNG or -BioCNG. The requirements outlined in OP 38 of -D.22-02025 apply only if SoCalGas procures the -BioSNG. At this time, WBF has not determined the end use for the biomethane.

**SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
Cal Advocates-SCG-A2510008-001
Woody Biomass Pilot Project application (A.25-10-008)
DATE REQUESTED: December 8, 2025
RESPONSE DUE: December 22, 2025**

QUESTION 3:

Provide any agreements WBF has made with SoCalGas regarding the combustion and non-combustion generation of electricity at the WBF facility pursuant to OP 39 and 40 of D.22- 02-025.

RESPONSE 3:

WBF does not intend to operate an onsite power generation facility; therefore, no agreements between SoCalGas and WBF exist regarding electricity generation.

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
Cal Advocates-SCG-A2510008-001
Woody Biomass Pilot Project application (A.25-10-008)
DATE REQUESTED: December 8, 2025
RESPONSE DUE: December 22, 2025

QUESTION 4:

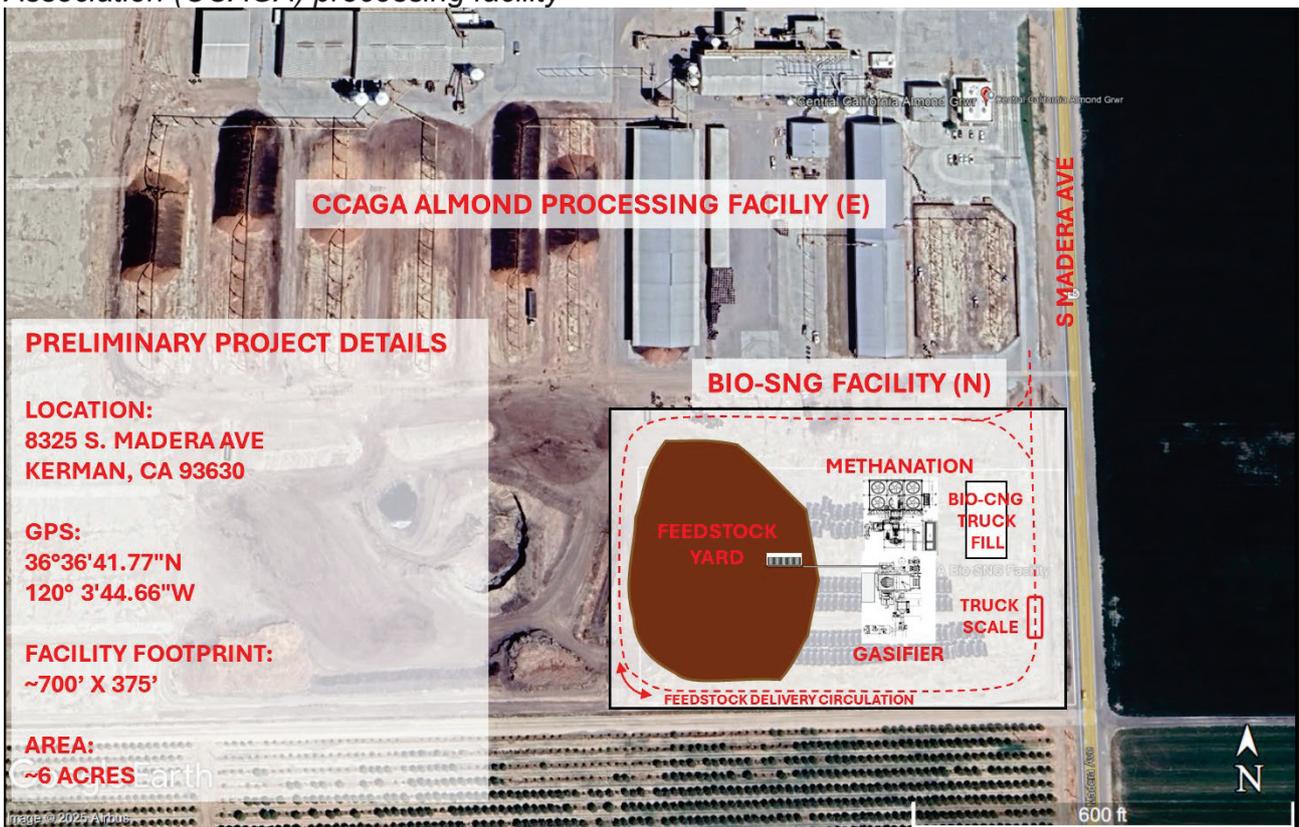
Provide facility maps and available engineering designs of the proposed WBF woody biomass pilot project location and the proposed SoCalGas interconnection point.

RESPONSE 4:

WBF Facility

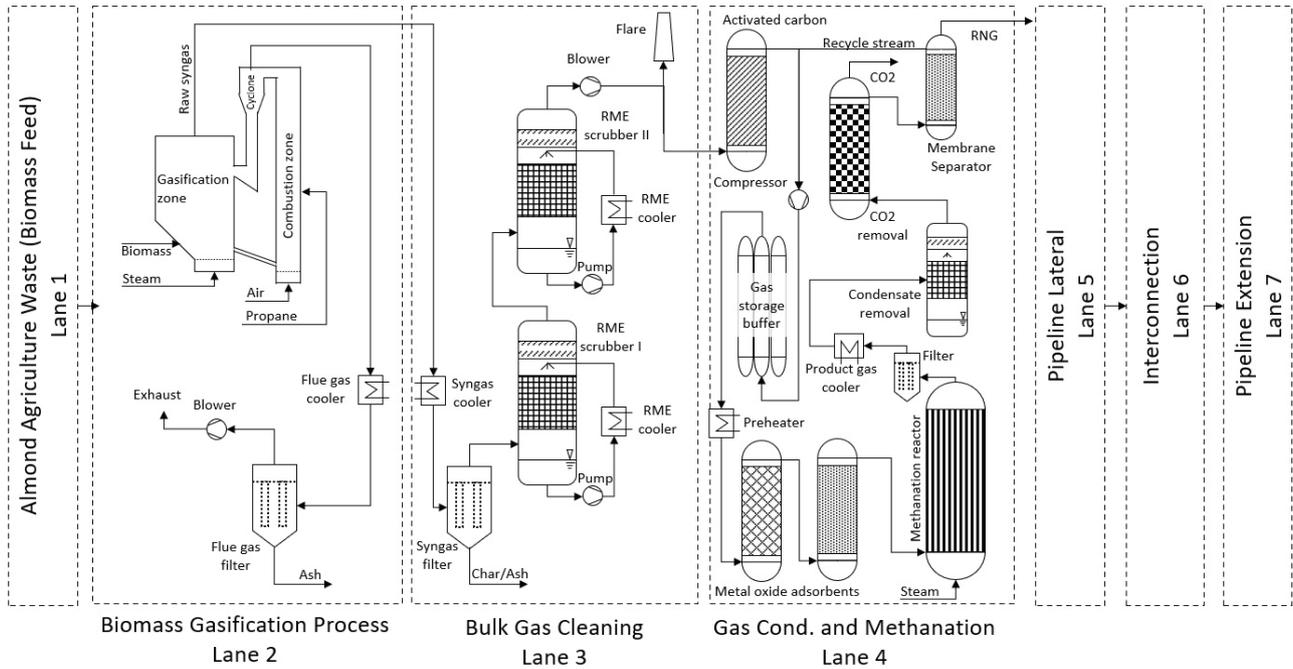
No design work has been completed to date. Below provides high-level site map and process flow diagram.

Proposed WBF site location located adjacent to Central California Almond Growers Association (CCAGA) processing facility



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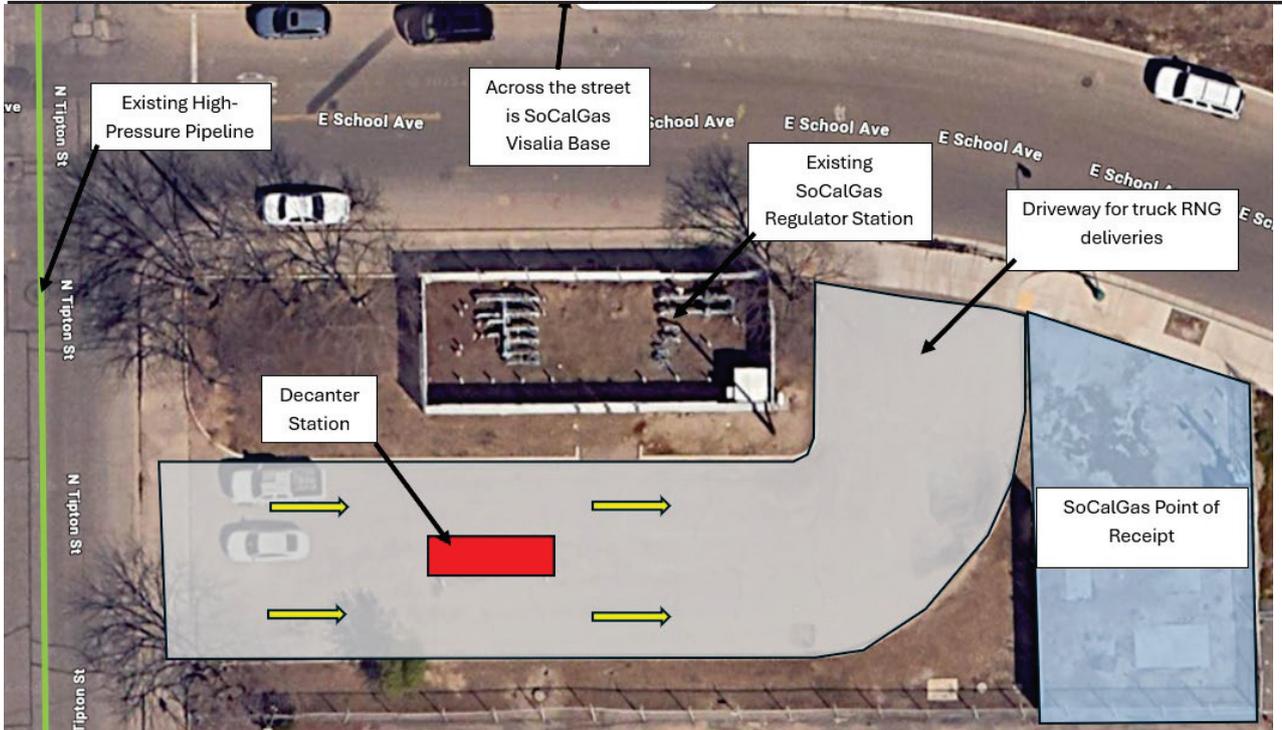
WBF Process Flow Diagram



SoCalGas Interconnection

No design work has been completed to date. Below provides high-level site map for the interconnection facility at the Visalia parcel.

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DATE REQUESTED: December 8, 2025
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QUESTION 5:

Did SoCalGas and WBF evaluate the feasibility of establishing the facility at a location at which direct interconnection with SoCalGas's pipelines were feasible? If so, provide all communications and analysis that discuss SoCalGas's and WBF's evaluation.

RESPONSE 5:

SoCalGas conducted an SB 1440 Screening Study to identify the nearest pipeline with sufficient capacity for the projected Bio-SNG volume. The RNG takeaway capacity analysis indicates that the nearest pipeline with adequate capacity is approximately 18 miles away, making it an economically unfeasible option. Below is the information provided to WBF, along with the screening study analysis completed by SoCalGas. Please see attached, Communications provided to WBF and SoCalGas's takeaway capacity analysis

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QUESTION 6:

Provide a breakdown in Excel format of the estimated costs associated with the construction, operation, and maintenance of the pilot's Utility-Owned Infrastructure (lanes 7, 8, and 9) by lane, including estimations of engineering costs, equipment and materials, construction, labor, and/or any other applicable cost categories. Include a line item for costs associated with the construction, operation, and maintenance of gathering pipeline laterals, if applicable.

RESPONSE 6:

For questions 1, 6, and 7, SoCalGas will need an extension to respond by January 9, 2026. We have been diligently working on gathering responsive data, but the holidays have interfered with our efforts with relevant people out on vacation.

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
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RESPONSE DUE: December 22, 2025

QUESTION 7:

Provide a breakdown in Excel format of the estimated costs associated with the construction, operation, and maintenance of the pilot's Applicant-Owned Infrastructure (lanes 1 through 6) by lane, including estimations of engineering costs, equipment and materials, construction, labor, and/or any other applicable cost categories.

RESPONSE 7:

For questions 1, 6, and 7, SoCalGas will need an extension to respond by January 9, 2026. We have been diligently working on gathering responsive data, but the holidays have interfered with our efforts with relevant people out on vacation.

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
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DATE REQUESTED: December 8, 2025
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QUESTION 8:

Describe the funding mechanisms anticipated to be used to cover any WBF and SoCalGas project costs that exceed the \$19.704 million in Cap-and-Trade allowance proceeds allocated for this project.

- a. SoCalGas testimony at JL-19 states “There is no anticipated revenue requirement that is being proposed for recovery from ratepayers associated with the Utility-Owned Pipeline Infrastructure presented herein.” Does SoCalGas anticipate that ratepayer funding will be needed to support any of the costs associated with the construction of applicant-owned infrastructure related to this project? i. If so, what is the anticipated impact on rates that would result from these costs?

- b. How does SoCalGas plan to contend with any potential cost-overages for the construction of applicant- or utility-owned infrastructure related to this project?

RESPONSE 8

Other than the \$19.704 million in cap-and-trade funding, SoCalGas does not plan to utilize any ratepayer funding for the utility-owned and applicant-owned infrastructure.

- a) No
- b) Not applicable

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QUESTION 9:

Did SoCalGas consider and/or quantify the potential wildfire prevention benefits associated with the diversion of biomass waste due to this pilot project?

- a. If so, provide the analysis used to quantify those benefits in Excel format with active cells and formulas.

RESPONSE 9:

- a) SoCalGas did not assess or quantify potential wildfire prevention benefits because no bids were received from projects proposing the use of forest woody biomass. However, WBF's technology is capable of utilizing forest woody biomass, making this demonstration relevant for that feedstock in future projects.

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QUESTION 10:

Describe how the proposed pilot project, which would convert up to approximately 29,200 bone dry tons (BDT) per year of agricultural waste into biomethane, aligns with SoCalGas's short-term target of procuring sufficient to divert approximately four million tons of organic waste from landfill by 2025, per D.22-02-025?

- a. What parameters did SoCalGas consider in the sizing of this project?

- b. How do the diversion rates and costs associated with this project compare to those of SoCalGas's other biomass diversion projects?

RESPONSE 10:

The woody biomass feedstock identified for the proposed pilot project does not meet the eligibility requirements under SB 1440's short-term target, as the material is not currently directed to landfill disposal.

- a) The solicitation issued by SoCalGas for the selection of at least one woody biomass pilot project did not specify any sizing requirements.
- b) As stated above, none of the woody biomass is currently directed for landfill disposal, so there is nothing to divert from landfills.

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QUESTION 11:

Explain how SoCalGas chose the proposed project's location of the gasification facility in Kerman, California and the new interconnection facility on a company-owned parcel in Visalia, California. Include in your explanation:

- a. Other potential locations considered and selection criteria and scoring, if applicable; and

- b. Communications between SoCalGas and the Department of Conservation, Natural Resources Agency, and Commission's Energy Division regarding the strategic placement of the pilot project. If SoCalGas is unable to provide the communications, provide a summary of the communications.

RESPONSE 11:

a)

WBF Gasification Facility - SoCalGas issued a Solicitation and WBF was the sole respondent whose proposal met the requirements under D.22-02-025 and D.24-12-032, to build, own, and operate a gasification facility which has a proposed location of Kerman, California.

SoCalGas Interconnection Facility - SoCalGas selected the Visalia site based on the following factors: (1) the parcel is owned by SoCalGas; (2) proximity to an existing SoCalGas operating base, facilitating monitoring of the interconnection facility; (3) prior use of the location as a compressed natural gas (CNG) refueling station with existing driveways; and (4) adjacent to a high-pressure pipeline with sufficient RNG takeaway capacity, thereby minimizing pipeline extension costs. SoCalGas also evaluated a parcel it owns in the City of Dinuba; however, the site does not offer the advantages identified in items (2) and (3) above

- b) Because WBF was the sole respondent to SoCalGas's solicitation and proposed a gasification-to-biomethane facility in Kerman, located near the available woody biomass feedstock, SoCalGas's engagement with the Department of Conservation (DOC) and the Commission's Energy Division was limited to providing information rather than conducting strategic siting discussions for the proposed pilot project.

ATTACHMENT 2

SoCalGas Responses to Cal_Advocates-SCG-A2510008-001

Questions 1 and 6

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
Cal Advocates-SCG-A2510008-001
Woody Biomass Pilot Project application (A.25-10-008)
DATE REQUESTED: December 8, 2025
RESPONSE DUE: January 9, 2025

QUESTION 1:

SoCalGas presents the GREET analysis for the proposed pilot project in Table 1 (p. JL-15), Table 2 (p. JL-16), Table 3 (p. JL-17), and Attachment 1 of Prepared Direct Testimony of James Lucas. Provide the full life-cycle GREET model for the proposed pilot project in Excel format. The Excel spreadsheet should include, but not be limited to, active cells and formulas for the following information:

- a. Baseline carbon intensity and criteria pollutant biomass types, base case disposal methods, and Bio-SNG use case carbon intensity and criteria pollutants with and without carbon capture and storage (CSS).
- b. The methodology used to express baseline carbon intensity and criteria pollutant emissions on a basis of potential megajoule of biosynthetic natural gas (Bio-SNG) production.
- c. Delineated calculations by the production steps.
- d. Well-to-wheel (WTW) carbon intensity for compressed Bio-SNG fuel (Bio-CNG).
- e. The sources and assumptions used to determine the biogenic CO₂ credit of -55.0 gCO₂e/MJ assigned.
- f. Document the sources of data, emission factors, and other assumptions, including but not limited to any source testing, permits, manufacturer certifications, technical reports, or models used to support the analysis.

RESPONSE 1:

Responses below are from Matt D. Summers

An Excel workbook with active cells will be provided concurrently with a confidentiality declaration in accordance with Decision ("D.") 21-09-020 and General Order ("GO") 66-D Revision 2.

- a) Both the base case and the use case results can be traced from the sheets "Baseline Case" and "Bio-SNG Use Case" respectively.
- b) The calculations can be traced on the sheet "Baseline Case".
- c) These steps are delineated on sheet "Bio-SNG Use Case".
- d) The WTW results are shown on sheet "WTW".
- e) This is shown on sheet "WTW" and represents the avoided fossil CO₂ emissions from CNG combustion during CNG vehicle operation, directly obtained from R&D GREET 2024. This figure assumes that non-CO₂ emissions would not necessarily be avoided in the Bio-SNG case (i.e., VOC, CO).
- f) The sources for the emissions factors have been shared in other testimony and are noted in the workbook

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DATE REQUESTED: December 8, 2025
RESPONSE DUE: January 9, 2025

QUESTION 6:

Provide a breakdown in Excel format of the estimated costs associated with the construction, operation, and maintenance of the pilot's Utility-Owned Infrastructure (lanes 7, 8, and 9) by lane, including estimations of engineering costs, equipment and materials, construction, labor, and/or any other applicable cost categories. Include a line item for costs associated with the construction, operation, and maintenance of gathering pipeline laterals, if applicable.

RESPONSE 6:

Estimated costs for Lanes 7, 8, and 9 are based on a Class 5 estimate. A Class 5 estimate can range from -50% on the low side to +100% on the high side. The provided costs are preliminary estimates based on the project description. The estimate was developed using historical data from comparable Renewable Natural Gas Point-Of-Receipt facility projects, recent budgetary vendor quotes, and assumptions about project design and construction. These ranges encompass anticipated costs for engineering, equipment and materials, construction, labor, and other applicable categories. See supporting Excel file for estimated costs breakdown.

ATTACHMENT 3

SoCalGas Responses to Cal_Advocates-SCG-A510008-002

Questions 1-9 and 11

SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)
Cal Advocates-SCG-A2510008-002
Woody Biomass Pilot Project application (A.25-10-008)
DATE REQUESTED: February 11, 2026
RESPONSE DUE: February 26, 2026

QUESTION 1:

Has SoCalGas been in discussion with WBF regarding the cost of procurement of biosynthetic natural gas ("Bio-SNG") from the proposed Woody Biomass Project? If so, what are the expected or contracted costs of biomethane produced from the Woody Biomass Project in \$/MMbtu?

RESPONSE 1:

No.

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DATE REQUESTED: February 11, 2026
RESPONSE DUE: February 26, 2026

QUESTION 2:

D.22-02-025 Ordering Paragraph (OP) 1 and OP 2 at p. 57 required that SoCalGas “host a workshop on cost-effectiveness within 45 days of the effective date of this decision” and “include results of the workshop and address feedback received at the workshop in Tier 2 Advice Letters establishing a Standard Biomethane Procurement Methodology.” SoCalGas submitted the Joint Tier 2 Advice Letter (AL) 6003-G on July 5, 2022, in response to this requirement.

QUESTION 2a:

Provide the confidential version of AL 6003-G.

RESPONSE 2a:

SoCalGas objects to this request as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence because SoCalGas has not entered into a procurement agreement with West Biofuels nor is it a requirement under D.22-02-025 pursuant to D.24-01-060.

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RESPONSE DUE: February 26, 2026

QUESTION 2b:

Did SoCalGas follow their Standard Biomethane Procurement Methodology (SBPM) when developing the Woody Biomass Project?

- i. If so, would Bio-SNG procurement from the Woody Biomass Project meet the standards set in SoCalGas's SBPM?
- ii. If not, explain why.

RESPONSE 2b:

No, because SoCalGas does not have a procurement agreement with West Biofuels and is no longer mandated to procure biomethane from this project pursuant to D.24-01-060.

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QUESTION 2c:

If SoCalGas did follow their SBPM when developing the Woody Biomass Project, provide the following information related to the SBPM conditions described in AL 6003-G.

- i. The calculated Break-Even Price for renewable natural gas (“RNG”), including the components of the All-In Cost of RNG and of the All-In Cost of Conventional Natural Gas described in Appendix A of AL 6003-G at 4 and 5.
- ii. The scored Monetary Costs of the project, calculated as the contract price, or procurement costs, divided by the Break-Even Price.
- iii. A description of and monetized value assigned to each of the Other Environmental & Non-Monetary Factors associated with the project, including those listed in Appendix A of AL 6003-G at 5.
- iv. The weights assigned to the Monetary Costs score and Non-Monetary Factor score used to determine the SBPM Project Score as described in Appendix A of AL 6003-G at 5 and 6.

RESPONSE 2c:

Not applicable because SoCalGas does not have a procurement agreement with West Biofuels and is no longer mandated to procure biomethane from this project pursuant to D.24-01-060.

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DATE REQUESTED: February 11, 2026
RESPONSE DUE: February 26, 2026

QUESTION 3:

D.22-02-025 OP 43 at p. 68 requires that biomethane gasification pilot projects “study and report fugitive methane, pollutant, and particulate matter emissions and emissions reduction or elimination methods in the gasification or pyrolysis process, the methanation process, and pipeline infrastructure.”

In the Prepared Direct Revised Testimony of James Lucas and Dr. Matthew D. Summers, SoCalGas states that “SoCalGas and WBF meet this criterion by committing to thorough emissions documentation and reporting for the SB 1440 Pilot Project” (p. JLMS-11) and that “SoCalGas will work with the Commission and/or other state agencies to develop a reporting template for the SB 1440 Pilot Project” (p. JLMS-20).

QUESTION 3a:

Describe any methods SoCalGas and WBF have established or considered to document, study, and report fugitive methane, pollutant, and particulate matter emissions in the gasification or pyrolysis process, the methanation process, and pipeline infrastructure associated with the Woody Biomass Project.

RESPONSE 3a:

SoCalGas and WBF have not established or considered methods to document, study and report emissions. As provided in SoCalGas’s Reply Comments Section II(A)(3) at pages 4 and 5.¹ “Section IV of the Application’s Chapter 2 testimony (titled “Program Reporting”) nonetheless provides a roadmap for studying and monitoring emissions.² This includes SoCalGas working “with the Commission and/or other state agencies to develop a reporting template for the SB 1440 Pilot Project.”³ This approach is similar to that undertaken in the SB 1383 Dairy Biomethane Pilot Projects. The Commission and its constituent agencies are leading the data reporting process in such projects.⁴ The Application thus contemplates monitoring, studying, and reporting emissions by proposing to utilize the existing processes used by these pilot projects, pending determination by the Commission and its constituent agencies.”

¹ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M588/K915/588915254.PDF>

² SoCalGas Chapter 2 (Lucas/Summers) at JLMS-20.

³ *Id.*

⁴ D.17.12-004, Attachment B at 4.

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QUESTION 3b:

Provide any analyses SoCalGas and/or WBF have conducted regarding the feasibility and/or effectiveness of fugitive emission monitoring technologies or methodologies for the Woody Biomass Project.

RESPONSE 3b:

SoCalGas and/or WBF have not conducted this type of specific analysis for the SB 1440 Woody Biomass Pilot Project. The response to Question 4 provides the procedures planned to be used by SoCalGas and WBF to address fugitive methane emissions.

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RESPONSE DUE: February 26, 2026

QUESTION 4:

D.22-02-025 OP 49, p. 70-71 states, “in the procurement contract, the utilities shall establish a procedure for immediate methane leak remediation at the production facility or along that gas pipeline interconnection as the preferred response, and specify required actions if there is no immediate remediation, such as timeline for repair, a graduated fee schedule to promote timely repair, or payment reductions, etc.” Provide the procedures for methane leak detection and remediation that SoCalGas and WBF have established for the production facility and associated operations (Lane 3 through Lane 6) and the pipeline point of receipt, interconnection, and pipeline extension (Lane 7 through Lane 9).

RESPONSE 4:

SoCalGas objects to the request on the grounds that SoCalGas does not have a procurement contract with West Biofuels and is no longer mandated to procure biomethane from this project pursuant to D.24-01-060.

Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

SoCalGas and WBF plan to utilize the following for methane leak detection and remediation.

The following apply to the Lanes 3 to 6 (to be performed by WBF)

- **Methane Leak Detection:** WBF employs regular scheduled inspections using advanced methane detection technologies, such as handheld detectors, optical gas imaging cameras, and continuous monitoring systems within confined areas and buildings. Inspections are conducted at key points, including production equipment, pipeline connections, and transfer points.
- **Immediate Remediation Procedure:** Upon detection of a methane leak, field personnel are required to assess the severity and, where safe and practical, initiate immediate repairs to stop the leak. If immediate remediation is not possible due to operational or safety constraints, the incident is escalated for urgent scheduling of repairs.
- **Timelines and Escalation:** For leaks that cannot be immediately repaired, WBF will follow a defined escalation process. This includes documenting the leak, notifying responsible parties, and setting a timeline for repair based on the leak’s size and potential impact. All leaks are tracked until resolution.
- **Verification and Reporting:** All leak detection and remediation activities are documented and reported as required by regulatory authorities. Verification of repair completion is performed before resuming normal operations at the affected site.

The following apply to Lanes 7-9 (to be performed by SoCalGas)

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Leakage detection would be conducted in accordance with SoCalGas's most current gas standard for leakage survey. Frequency of monitoring will be based on location, material type, and operating pressure

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RESPONSE DUE: February 26, 2026

QUESTION 5:

In reference to “A.25-10-008-01_Cal_Advocates-SCG-01_Response_to_Q1.pdf,” methane leakage emission factors are not clearly delineated in the GREET model presented.¹ Provide information about the “methane leak standard,” methane leakage assumptions, or methane leakage emission factors included in the GREET life cycle emission modeling. Provide the leakage information for each Lane of the project and individual processes or equipment as applicable.

RESPONSE 5 (WBF)

The WBF Bio-SNG production infrastructure (Lanes 2-5) are not permitted to operate with leakage for safety reasons. The WBF Facility uses gas-tight reactor vessels, valves, and compressors and methane impervious stainless-steel piping that are not expected to have any leakage during normal operations. Therefore, no continuous leakage assumption was used in the GREET modeling.

As stated in Response to Question 4, the SoCalGas interconnection facility (Lanes 7-9) will adhere to SoCalGas’s current gas standard for leakage survey and assumes no continuous leakage as this could be identified and addressed during the leakage survey process.

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QUESTION 6:

In reference to "Cal Advocates-SCG-A2510008-01_Response_to_Q1_and_Q6.pdf", and the accompanying "Lanes 7-8-9 Cost Breakdown Draft.xlsx," the estimated sum cost of lanes 7, 8, and 9 would be \$9.966 million.

QUESTION 6a:

Confirm that SoCalGas's estimate of \$9.966 million of the authorized \$19.704 million in Cap-and-Trade funds is allocated to utility-owned infrastructure.

RESPONSE 6a:

Yes.

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QUESTION 6b:

Has SoCalGas communicated with West Biofuels regarding the availability of potential funding for project infrastructure that would be owned by West Biofuels? If so, provide any and all such communications.

RESPONSE 6b:

The availability of potential funding for project infrastructure was communicated to all parties who received the SB 1440 Woody Biomass Pilot Project solicitation. The availability of potential funding was also included in Lucas/Summers Revised Testimony at JLMS-18. There was also some verbal communications with West Biofuels.

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QUESTION 6c:

Provide the historical data used from comparable Renewable Natural Gas Point-Of-Receipt facility projects, in designing your cost estimates. Include the details of your response in an Excel Spreadsheet.

RESPONSE 6c:

The most recently completed RNG project with comparable scope served as the historical benchmark for developing the Lane 8 and 9 Class 5 estimates. This project was selected as it reflects the most up-to-date design practices and provides the closest cost equivalency for benchmarking. The corresponding benchmark scope components are presented below:

Historical Benchmark - Pipeline vs POR			
			EAC
Estimate at Completion (EAC)	\$10,050,000	Pipeline	\$5,130,000
		Point of Receipt	\$4,920,000

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QUESTION 6d:

Provide the correlated historical data with each cost function, per line item.

RESPONSE 6d:

Below is the historical data for the tracked cost functions from the Simi Valley project the historical benchmark project of comparable scope. Each cost function includes both the pipeline and POR costs. The totals below are 2025 dollars with no applied escalation.

Historical Benchmark - Cost Analysis	
Cost Function	Total
Company Labor	\$580,000
Engineering Contractor	\$740,000
Material	\$1,650,000
Construction Contractor	\$3,920,000
Construction Management	\$880,000
Other Purchased Services	\$730,000
Total Direct Cost	\$8,500,000
Total Non-Direct Cost	\$1,550,000
Combined Total Cost	\$10,050,000

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RESPONSE DUE: February 26, 2026

QUESTION 6e:

How many full-time employees (FTEs) and/or contract staff are included in your cost estimates?

RESPONSE 6e:

The total FTEs are calculated based on a 36-month schedule for project initiation through closeout.

Cost Function	Total HRS	Total FTEs
Total FTE	3971.00	2.40

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QUESTION 6f:

Provide the respective cost function and specific department where each FTE and/or contract staff is employed.

RESPONSE 6f:

FTEs are calculated based on a 36-month schedule for project initiation through closeout.

Cost Function	Total HRS	Total FTE	Resources
Project Management	3971	0.66	Portfolio Manager, Project Manager, Project Engineer, Project Coordinator
Engineering and Design	1896	0.31	Engineering Team Lead, Pipeline Engineer, Station Engineer, Civil Engineer, Pipeline Integrity Coordinator, Survey Manager, Survey Technician, Pipeline Integrity Team Lead
Material - Permanent	0	0	No labor assumed
Material - Consumable & Temp	0	0	No labor assumed
Fabrication	0	0	No labor assumed
Construction	2920	0.48	Chief Inspector, Welding Inspector, Utility Inspector, Field Construction Lead, Construction Team Lead, Field Engineer, Construction Manager, Safety Inspector
Commissioning	160	0.03	District Union Labor Manager
Operations	2334	0.39	District Union Manager, District Union Labor Manager, Construction Team Lead, Field Engineer, Safety Inspector, District Union Labor
Project Support Services	1386	0.23	Estimator, Permit Lead, Permit Coordinator, Public Affairs Manager, Material Coordinator, Supply Management Lead, Scheduler, Cost Controller, Outreach Specialist
Environmental	1096	0.18	Environmental Manager, Environmental Team Lead, Environmental Project Manager, Environmental Project Assistant, Certified Industrial Hygienist, Asbestos Consultant, Abatement Superintendent, Abatement Laborer, Abatement Warehouseman, Abatement Admin, Abatement Truck
Land & Right of Way	748	0.12	Administrative Assistant, Land Manager, Land Specialist, Project Manager
Land	0	0	Land purchase cost only, none assumed
-Permitting	0	0	Permit cost only (Labor included in project services)
Project Overhead	0	0	Indirect Costs

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RESPONSE DUE: February 26, 2026

QUESTION 6g:

Provide the number of labor hours associated with each FTE and/or contract staff.

RESPONSE 6g:

Refer to response 6f.

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QUESTION 6h:

Provide the budgetary vendor quotes used in your cost estimates.

RESPONSE 6h:

The attached documents contain Confidential and Protected Materials Pursuant to PUC Section 583, General Order 66-D, D.21-09-020.”

While the estimates for Lanes 8 and 9 were developed using historical data, the estimate for Lane 7 was developed with a vendor high-level budgetary quote.

The estimate for Lane 7, Decanter and Offloading system, was developed with the use of a vendor quote.

Please see attachment DR-02 Q6h Lane 7 Vendor Quote_CONFIDENTIAL.

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QUESTION 6i:

i. Provide the specific line-item costs associated with:

- i. The approximate number of feet of pipeline needed for installation.
- ii. Construction materials.
- iii. Meter Assembly (MSA).
- iv. SCADA Panel.
- v. Equipment Shelter.

RESPONSE 6i:

Line Item	Cost*	Notes
i. The approximate number of feet pipeline needed for installation	\$700k	Total installed cost of approximately 200 Linear Feet of Pipe from Point of Receipt to Tie-In of existing pipeline.
ii. Construction Materials		Construction materials are procured by contractors during construction.
iii, iv and v. Point of Receipt Equipment	\$1.361M	
Electrical Shelter	\$227k	The Meter Set Assembly (MSA), SCADA panel, and Equipment Shelter are integrated components of the Point of Receipt (POR) and are essential to supporting its operation. The specialty material costs are provided in response to questions iii, iv and v.
Total Flow Computer	\$12k	
Analyzer shelter	\$262k	
Analyzer Fittings	\$23k	
O2 Analyzer	\$21k	
Gas Chromatograph	\$29k	
YZ odorant skid	\$257k	
Filter Separator	\$106k	
RTU Panel	\$81k	
Magnetic Level Gauge	\$41k	
Orifice Plate	\$42k	
Control Valves & Cabinet	\$155k	

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Sampling Bottle	\$7k
Gas Analyzer	\$75k
Sample Probe	\$2k
Pressure Transmitter	\$21k

* The material line-item costs are presented with escalation.

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QUESTION 7:

In reference to SoCalGas's General Rate Case (GRC) A.22-05-015, et al., as found in Decision (D). 24-12-074, Table 10.3, Line A at 187. Provide the specific workpapers presented in its GRC as it relates to new construction pipeline capital improvement expenditures. In the response include pipeline sizing, length, and system use, including the differentials of SoCalGas's zero-based forecast and Class 5 estimate.

RESPONSE 7:

Below is the link to SoCalGas' GRC workpapers in relation to new construction pipeline capital improvement expenditures.

[SCG-06-CWP-R Rick Chiapa and Aaron Bell and Steve Hruby-Gas Transmission Operations and Construction 49453.pdf](#)

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QUESTION 8:

In reference to “Cal Advocates-SCG-A2510008-01_Response_to_2-5_8-11.pdf,” SoCalGas states that “other than the \$19.704 million in cap-and-trade funding, SoCalGas does not plan to utilize any ratepayer funding for the utility-owned and applicant-owned infrastructure.”

QUESTION 8a:

How does SoCalGas plan to fund ongoing maintenance and operations associated with the new utility-owned pipelines and/or associated infrastructure?

RESPONSE 8a:

SoCalGas is not proposing to fund ongoing maintenance and operations for Lanes 7-9. Within A.25-10-008, under Attachment A Renewable Gas Interconnection Agreement, Section 9(a) titled “O&M FEES: INVOICING AND PAYMENT TERMS”, it states that “Utility shall collect operation and maintenance fees associated with the operation and maintenance of the Utility Facilities necessary to accept Renewable Gas from Interconnector in accordance with Utility’s Gas Rules, tariffs, schedules, and ordinary business practices.”

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QUESTION 8b:

Does SoCalGas plan to fund ongoing maintenance and operations associated with pipelines and/or associated infrastructure owned by West Biofuels?

RESPONSE 8b:

SoCalGas does not plan to fund the ongoing maintenance and operation of assets owned by WBF, as referenced in Attachment B (Page 6, Chapter 3, Section a-iv) of the Application.

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QUESTION 9:

Regarding SoCalGas and West Biofuels historical business relationship:

QUESTION 9a:

Has SoCalGas contracted with West Biofuels for biomethane projects prior to the solicitation made in compliance with D.22-02-025? If so, provide a list of the projects, including for each:

- The project name and location;
- The date the contract was signed;
- If the contract is still active; and,
- A brief description of the products and/or services provided.

RESPONSE 9a:

SoCalGas has participated in one project with WBF in which SoCalGas contracted with the Alliance for Sustainable Energy, LLC, a manager and operator of the National Renewable Energy Laboratory (NREL) to fund an RD&D project performed by WBF.

- Project Name: West Biofuels Renewable Gas Separation System and Techno-Economic Assessment
- Location: Woodland, CA
- Contract Execution Date: December 10, 2019
- Contract Status: Not active
- Project Description: WBF was to conduct research demonstrating production and gas-separation technologies capable of converting forest biomass residuals into pipeline-quality renewable gas and value added byproducts.

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QUESTION 9b:

Has West Biofuels contacted SoCalGas in response to previous solicitations or on its own initiative? If so, provide a list of project proposals, including for each:

- The project name;
- The date SoCalGas received the proposal; and,
- A brief description of the proposed products and/or services to be provided.

RESPONSE 9b:

Other than the project referenced in the Response to Question 9a, neither SoCalGas nor WBF recalls any instance in which WBF contacted SoCalGas.

SoCalGas also notes that, in responding to this question, it provided this question to the current business unit personnel most likely to have information relevant to this response. SoCalGas's response relies on the memories of individuals and therefore may not capture the information requested in this question.

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QUESTION 11:

In reference to "Cal Advocates-SCG-A2510008-01_Response_to_2-5_8-11.pdf," SoCalGas states, "SoCalGas and WBF have not entered into any agreements regarding the vehicles to be used for producing BioSNG or -BioCNG." However, the direct Revised testimony of James Lucas and Dr. Matthew D. Summers at lines 18-23, p. JLMS-8 states, "the Bio-SNG produced will be transported by compressed natural gas-powered trucks (using renewable natural gas) to SoCalGas's interconnection in Visalia, CA."

QUESTION 11a:

Confirm if compressed natural gas-powered trucks using RNG will be used to transport the biomethane produced at the WBF facility to SoCalGas's operating base in the City of Visalia for injection and transport to SoCalGas's pipelines.

RESPONSE 11a:

Yes.

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QUESTION 11b:

If compressed natural gas-powered trucks using RNG will not be used to transport the biomethane produced at the WBF facility to SoCalGas's operating base in the City of Visalia, describe in detail, the methodology SoCalGas will utilize to transport and quality measure the syngas produced by the WBF facility.

RESPONSE 11b:

Not applicable.

ATTACHMENT 4

SoCalGas Response to Cal Advocates-SCG-A2510008-001 Question 6,
Excel spreadsheet “Lanes 7-8-9 Cost Breakdown Draft.xlsx,”
Tab “Overview”

LANE 7 - DECANTER	
COST FUNCTION	FORECASTED
TOTAL DIRECT COSTS	\$1,167,001
TOTAL INDIRECT COSTS	\$252,966
GROSS EXPENDITURES	\$1,419,967

LANE 8 - POINT OF RECEIPT	
COST FUNCTION	FORECASTED
TOTAL DIRECT COSTS	\$6,354,234
TOTAL INDIRECT COSTS	\$1,272,095
GROSS EXPENDITURES	\$7,626,329

LANE 9 - PIPELINE	
COST FUNCTION	FORECASTED
TOTAL DIRECT COSTS	\$701,806
TOTAL INDIRECT COSTS	\$218,117
GROSS EXPENDITURES	\$919,923

Direct Cost Total	\$8,223,041
Indirect Cost Total	\$1,743,178
Combined Total	\$9,966,219