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SoCalGas Comments on SB 423 Renewable and Firm Zero-Carbon Resources Update Report

Additional submitted attachment is included below.



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May 15, 2026

Chair David Hochschild
California Energy Commission
Docket Unit, MS-4
Docket No. 21-ESR-01
715 P Street
Sacramento, California 95814-5512

Subject: Comments on the Draft SB 423 Renewable and Firm Zero-Carbon Resources Update Report

Dear Chair Hochschild:

Southern California Gas Company (SoCalGas) appreciates the opportunity to provide comments on the California Energy Commission’s (CEC) draft Senate Bill (SB) 423 Renewable and Firm Zero-Carbon Resources Update Report (SB 423 report). SoCalGas commends the CEC for advancing an inclusive framework to identify and evaluate emerging firm, zero-carbon resources that can support California’s long-term reliability, decarbonization, and resiliency goals. The SB 423 report marks an important step in recognizing the critical role that clean, dispatchable resources must play as the State advances toward a decarbonized energy system.

SoCalGas supports the CEC’s technology-neutral approach and its recognition that a wide variety of eligible clean firm and dispatchable technologies will be needed to maintain grid reliability while meeting California’s climate objectives. A diverse portfolio of clean dispatchable resources—including, but not limited to, renewable natural gas (RNG), renewable hydrogen, long-duration energy storage, and carbon capture and storage (CCS)—will be essential to complement intermittent renewable generation and provide resource adequacy during periods of peak demand, extreme weather events, and system stress. Preserving multiple technology pathways will help mitigate risk, encourage innovation, and improve cost outcomes for ratepayers.

Moreover, many of the resources identified in the SB 423 report involve long development timelines, substantial infrastructure requirements, and significant upfront investment, all of which can introduce uncertainty for stakeholders evaluating future investment and development opportunities. Given these factors, it is important to clarify how the SB 423 report is intended to be used within broader state energy planning and procurement frameworks. Additional

information regarding whether and how the report may inform future planning processes, policy development, or procurement decisions would enable stakeholders to better assess the report's role and practical implications. Greater clarity on how state agencies plan to coordinate around the SB 423 report would further support informed decision-making and help reduce uncertainty regarding potential development pathways for eligible resources.

SoCalGas respectfully encourages the CEC to maintain its technology-inclusive approach under SB 423 and to continue working closely with the California Public Utilities Commission to provide greater transparency regarding how identified clean firm zero-carbon resources will be evaluated in long-term planning and resource procurement efforts. Improved coordination between state agencies will help unlock private investment, reduce market uncertainty, and support the development of a diverse and reliable portfolio of clean dispatchable resources. SoCalGas looks forward to continued engagement with the CEC on these matters and appreciates the opportunity to provide these comments.

Respectfully,

/s/ Kevin Barker

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