

DOCKETED	
Docket Number:	23-IEPR-01
Project Title:	General Scope
TN #:	254397
Document Title:	SoCalGas Comments on the Proposed 2023 IEPR
Description:	N/A
Filer:	System
Organization:	Southern California Gas Company
Submitter Role:	Public
Submission Date:	2/9/2024 4:36:59 PM
Docketed Date:	2/9/2024

*Comment Received From: Southern California Gas Company
Submitted On: 2/9/2024
Docket Number: 23-IEPR-01*

SoCalGas Comments on the Proposed 2023 IEPR

Additional submitted attachment is included below.



Kevin Barker
Senior Manager
Energy and Environmental Policy
555 West 5th Street
Los Angeles, CA 90013
Tel: (916) 492-4252
KBarker@socalgas.com

February 9, 2024

Commissioner Patricia Monahan
California Energy Commission
Docket Unit, MS-4
Docket No. 23-IEPR-01
715 P Street
Sacramento, CA 95814-5512

Subject: Comments on the CEC Proposed 2023 Integrated Energy Policy Report

Dear Commissioner Monahan,

Southern California Gas Company (SoCalGas) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Proposed 2023 Integrated Energy Policy Report (IEPR) released on January 31, 2024. SoCalGas commends the CEC for its diligence in identifying risks and opportunities that will arise as part of California's energy transition and carbon neutrality goals.

In particular, SoCalGas appreciates the updates to the draft which highlight the importance of expanding analysis on hydrogen infrastructure including delivery options and storage; the safety of transportation modes and the important role of the Pipeline and Hazardous Materials Safety Administration (PHMSA); the potential of renewable natural gas (RNG); and the need for establishing clarity in the regulatory structure of the State's pipelines.¹ SoCalGas strongly supports the CEC's acknowledgement of the need to assess the ability of low-carbon hydrogen production to support the State's clean energy and emissions reduction goals, per the requirements of Senate Bill (SB) 1075, as well as the role it will play in the industrial sector even though it was outside the scope of CEC's SB 1075 analysis.² Our comments in response to the Proposed Final 2023 IEPR focus on revisions to the description of SoCalGas' Angeles Link project.

¹ CEC, Proposed 2023 Integrated Energy Policy Report, January 31, 2024, p. 89, available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254255&DocumentContentId=89629>

² *Ibid.*, p. 62.

Request to Revise the Description of the Angeles Link Project for Accuracy

SoCalGas proposes revising the IEPR section focused on the Angeles Link project (page 72), as follows, to incorporate the most up-to-date project information for accuracy.

Southern California Gas Co. (SoCalGas) has proposed the Angeles Link project. ~~to convert up to four fossil gas power plants to clean and renewable hydrogen and include a dedicated hydrogen pipeline system of 200 to 750 miles. The system is planned to serve hard-to-electrify industries, electric generation, and the heavy-duty transportation sector in the Greater Los Angeles Area.~~ The Angeles Link system is envisioned to be a high-pressure, non-discriminatory pipeline system dedicated to public use. The system would transport clean renewable hydrogen from regional third-party production and storage sites to various end-users throughout Central and Southern California, including in the Los Angeles Basin (inclusive of the Ports of Los Angeles and Long Beach). In December 2022, the CPUC approved SoCalGas to commence Phase 1 feasibility studies and record the costs to a memorandum account.³

The CEC's diligent efforts to prepare this year's IEPR are readily apparent. SoCalGas appreciates the CEC's openness to recommendations and constructive input on developing areas of integration that will be critical for planning an energy system transition that can achieve decarbonization goals while remaining reliable, resilient, and cost-effective energy, particularly for our more vulnerable communities. SoCalGas looks forward to continuing to engage in the IEPR process in the future. We are proud to be a partner in California's climate efforts and look forward to the work ahead. Thank you for your consideration of our comments.

Respectfully,

/s/ Kevin Barker

Kevin Barker
Senior Manager
Energy and Environmental Policy

³ *Ibid.*, p. 72.