



July 31, 2023

Via email to:

alstakeholder@socalgas.com

ALP1_Study_CBO_Feedback@insigniaenv.com

Subject: SoCalGas Angeles Link hydrogen project does not address environmental justice concerns

To whom it may concern,

Climate Action Campaign is a nonprofit climate policy watchdog whose mission is to create a zero carbon future through equitable, effective policy action in Southern California. We participated in the SoCalGas Angeles Link CBOSG stakeholder meeting on June 22, 2023, and observed that the information presented raised numerous environmental justice concerns that were not addressed.

Below please find our feedback regarding the proposed project. As a small, community based organization, Climate Action Campaign did not have capacity to attend all Angeles Link meetings, which included additional 6-hour and 5.5 hour meetings, but we have reviewed the presentation decks from the July 20 and 21, 2023 CBO workshops, and the materials presented did not adequately address the concerns below.

Proposal ignores hydrogen costs and energy insecurity

Low income families pay a disproportionate percent of their income on energy. The largest survey of people experiencing homelessness in California in decades was published in June 2023, and it found that as little as \$300 per month in income, about the same cost as an average California utility bill (\$243 per month according to PG&E) would have kept up to 70% of them in housing.

It is well known that hydrogen is expensive – approximately \$16 per gallon equivalent when compared to gasoline – underscoring the importance of hydrogen costs as an equity issue. Utility bills can make or break a family economically, so when we consider energy policy decisions, these realities must be considered first.

In light of this, it is concerning that the question I asked during the meeting regarding ratepayer impacts was not answered – “Will the economic analysis for the Angeles Link proposal include impacts on ratepayers?”

This question must be answered before the project is allowed to move forward. Costs from the Angeles Link proposal could force California families into homelessness, and **pretending that the costs of the project are not material to the proposal is a reckless denial of the needs and economic realities of California families – particularly those in communities of concern.**

Proposal to allow fossil fuel-based hydrogen ignores climate realities and could increase climate impacts

It was also troubling to hear that **SoCalGas intends for Angeles Link to carry hydrogen created from both fossil fuels and renewable sources. SoCalGas representative Neil Navin said during the meeting that Angeles Link would be an “open access pipeline” for all sources of hydrogen. However, the sources of hydrogen are of the utmost importance.**

SoCalGas representatives stated during the meeting that their intention is to provide clean hydrogen, but if Angeles Link transports hydrogen sourced from methane gas, dirty grid electricity or other fossil sources, it would facilitate increased GHG intensity in our energy supply.

As NRDC explained in their recent [analysis on clean hydrogen deployment](#):

“A new study by Evolved Energy Research casts compelling insight into the heated debate around the IRA 45V clean hydrogen tax credits. The study finds that the three pillars of 1) new clean supply, 2) hourly matching and 3) deliverability will support substantial deployment of clean hydrogen in this decade. The study also concludes that all three pillars are the minimum guardrails against large carbon emissions increases from hydrogen production and derailing U.S. climate progress. The study – which can be added to the pile of evidence in favor of the three pillars—further crumbles unsubstantiated claims by proponents of looser rules that the three pillars will hobble industry growth. Those unsubstantiated claims are, yet again, proven to be resoundingly FALSE.”

NRDC’s statements are also supported by recent reports from [Energy Innovation](#) and [Princeton University’s ZERO Lab](#), which found that the three pillars of clean hydrogen are necessary to prevent significant emissions increases and a grim reversal in clean energy progress for the power sector and our economy.

Based on the information presented at the June 22, 2023 CBOSG stakeholder meeting, SoCalGas is not developing the Angeles Link project with the three pillars of clean

hydrogen in mind and is ignoring the Princeton University, Energy Innovation and Evolved Energy Research studies mentioned above.

The recent Intergovernmental Panel on Climate Change (IPCC) report says continued dependence on fossil fuels is not consistent with a livable future, with communities of concern feeling the impacts first and the worst. We do not have time for hydrogen sourced from fossil fuels.

Misinformation presented regarding SoCalGas “culture of safety”

During the meeting, SoCalGas representative Emily Grant said, “SoCalGas has a culture of safety,” but in 2015, SoCalGas was responsible for the largest methane gas leak in U.S. history, which dumped 100,000 tons of toxic chemicals into the air north of Los Angeles for months, forcing more than 8,000 families to flee their homes. Last year, SoCalGas and Sempra paid \$1.8 billion to settle with thousands of residents sickened by the blowout at Aliso Canyon.

During the Angeles Link meeting, SoCalGas representatives did not discuss their failures at Aliso Canyon or explain how SoCalGas would ensure the company would guarantee the public would not be harmed by the Angeles Link project or other operations in the future. SoCalGas has demonstrated that it cannot be trusted to safeguard community health or safety, and their decision to misrepresent their record of harm to the community during the Angeles Link meeting should prompt closer review of their proposal.

Though the presentation decks from the July 20 and 21 CBO workshops mention safety, they did not address these concerns.

SoCalGas lacks credibility due to ongoing proposal to blend hydrogen and methane gas in buildings

In September 2022, SoCalGas proposed to blend to spend \$13 million in ratepayer dollars to pipe, blend and burn a dangerous, experimental, and toxic mix of hydrogen and methane gas in ovens, furnaces, water heaters, dryers, and boilers in a 2,500-student UC Irvine freshman dormitory and numerous other student and faculty buildings on campus.

UC Irvine administrators rejected the proposal in March 2023 based on safety and environmental justice concerns from the UC Irvine community, including the fact that SoCalGas planned to locate the project in a freshman dorm, thereby ensuring students would have no knowledge of or ability to consent to the project before matriculation. None of the dozens of students or faculty we spoke to about the project had heard of it, even though the SoCalGas’ project timeline stated that community engagement had been ongoing for several months.

SoCalGas' decision to design the proposed UC Irvine project to ensure impacted communities would have no knowledge of or ability to consent to it demonstrates an ongoing practice of ignoring community safety, consent and participation in order to advance SoCalGas interests.

SoCalGas continues to pursue a hydrogen/methane blending pilot at UC Irvine, despite broad consensus that there is no need to incur all the uncertainty, costs, health, and safety risks that come with hydrogen blending experiments when electrification is an available, safe, pollution-free option for decarbonizing buildings today.

SoCalGas' approach in the UC Irvine pilot project demonstrates that the company continues to act in bad faith and that their stated intent to pursue clean hydrogen through Angeles Link lacks credibility, particularly when considered with the other issues mentioned in this letter.

Summary

As a small, community based organization, Climate Action Campaign did not have capacity to attend all Angeles Link meetings, which included additional 6-hour and 5.5 hour meetings, but we have reviewed the presentation decks from the July 20 and 21 CBO workshops, and the materials presented did not address these concerns.

Clean hydrogen is a precious, costly and extremely scarce resource that will play a necessary role in the clean energy transition. Based on the information presented during the meeting and facts stated above, we have serious concerns regarding this project and caution that ratepayers should not be asked to subsidize any projects that would increase their energy bills, increase environmental injustice and safety risks while also increasing climate pollution. **The proposal should not move forward until these issues are addressed to ensure that the project meets the state's climate and environmental justice goals.**

Thank you for safeguarding the community's interests with regard to the Angeles Link proposal.

Sincerely,

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