

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Gas Company (U904G), San Diego Gas and Electric Company (U902G), Pacific Gas and Electric Company (U 39 G), and Southwest Gas Corporation (U905G) to Establish Hydrogen Blending Demonstration Projects.

Application 22-09-006
(Filed March 1, 2024)

RESPONSE OF THE GREEN HYDROGEN COALITION TO THE JOINT AMENDED APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), PACIFIC GAS AND ELECTRIC COMPANY (U 39 G), AND SOUTHWEST GAS CORPORATION (U 905 G) TO ESTABLISH HYDROGEN BLENDING DEMONSTRATION PROJECTS

Janice Lin
FOUNDER & PRESIDENT

CARL STILLS
*INTERIM EXECUTIVE DIRECTOR
AND POLICY DIRECTOR*

GREEN HYDROGEN COALITION
10265 Rockingham Dr.
Suite #100-4061
Sacramento, CA 95827
Telephone: 760-550-5780
Email: cstills@Ghcoalition.org

April 19, 2024

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Gas Company (U904G), San Diego Gas and Electric Company (U902G), Pacific Gas and Electric Company (U 39 G), and Southwest Gas Corporation (U905G) to Establish Hydrogen Blending Demonstration Projects.

Application 22-09-006
(Filed March 1, 2024)

RESPONSE OF THE GREEN HYDROGEN COALITION TO THE JOINT AMENDED APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G), PACIFIC GAS AND ELECTRIC COMPANY (U 39 G), AND SOUTHWEST GAS CORPORATION (U 905 G) TO ESTABLISH HYDROGEN BLENDING DEMONSTRATION PROJECTS

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Green Hydrogen Coalition (“GHC”) hereby submits this response to the *Joint Amended Application Of Southern California Gas Company (U 904 G), San Diego Gas & Electric Company (U 902 G), Pacific Gas And Electric Company (U 39 G), and Southwest Gas Corporation (U 905 G)* [“the Joint Utilities”] to *Establish Hydrogen Blending Demonstration Projects* (“Amended Application”), submitted and filed by the Joint Utilities on March 1, 2024.

I. INTRODUCTION.

GHC is a California educational 501(c)(3) non-profit organization. GHC was formed in 2019 to recognize the game-changing potential of "green hydrogen" to accelerate multi-sector decarbonization and combat climate change. GHC's mission is to facilitate policies and practices that advance green hydrogen production and use across all sectors of the economy to accelerate a carbon-free energy future and a just energy transition. Our sponsors include renewable energy

users and developers, utilities, and other supporters of a reliable, affordable green hydrogen fuel economy for all.

In summary, the GHC endorses the Amended Application, recognizing its potential to enhance California's comprehension of green hydrogen's role in expediting the decarbonization of the state's energy industry and sectors that are challenging to electrify. GHC commends the Joint Utilities for submitting the Amended Application to establish live hydrogen blending demonstration projects in their territories. The efforts of the Joint Utilities to propose pilot programs to test hydrogen blending in natural gas at concentrations above 0.1%, the trigger level, are pivotal to spur the development of a hydrogen economy, supporting the State's decarbonization goals and ensuring an orderly and feasible transition away from natural gas while retaining reliability and bolstering the local economy. Ultimately, the Amended Application follows the guidance of the Commission under Decision (D.) 21-07-005 to increase collaboration and address research concerns.

II. RESPONSE.

Overall, the GHC supports the Joint Utilities' Amended Application, particularly as the world seeks to transition towards more sustainable and clean energy resources. The pilot projects listed in the application will play a crucial role in testing, demonstrating, and refining the integration of hydrogen into existing natural gas infrastructure and application. The GHC would like to underscore the following two points;

1) The Amened Application addresses the Commission's prior concerns

The Amended Application represents a substantial improvement over prior applications regarding this matter. As detailed in the testimony attached to the Amended Application, the projects seeking approval meet the directives established by the Commission in Decision ("D.")

21-07-005, which dismissed, without prejudice, Application (“A.”) 20-11-004 and D.22-12-057 and provided additional guidance regarding hydrogen blending pilot projects as part of the Biomethane Rulemaking.

2) Pilot hydrogen blending projects are necessary to understand technical feasibility and safety.

The development of pilot hydrogen blending projects is a necessary step to better understand the technical needs of these ventures under real-world conditions. Currently, the transport and storage of green hydrogen has created a high barrier to entry due to the investment needed to support new infrastructure. Thus, utilizing existing assets can provide the push to get the hydrogen ecosystem started. By filling critical knowledge gaps regarding critical safety and operational parameters, pilot projects will allow the industry and the Commission to better ascertain and eventually develop an industry-wide blending standard. The Commission should look to other jurisdictions already successfully implementing blending, like in Hawaii, where over a thousand miles of gas pipeline networks accommodate a mix of synthetic natural gas and up to 15% hydrogen. Each new project can help test specific challenges, adding to the overall knowledge base. In this context and considering the importance of the hydrogen economy to decarbonize the power, industrial, and transportation sectors, as noted by the University of California (“UC”) Riverside’s 2022 Hydrogen Blending Impacts Study, GHC supports the Amended Application and urges the Commission to approve it as filed.

III. CONCLUSION.

GHC appreciates the opportunity to submit this response and looks forward to working with the Commission and stakeholders in this proceeding.

Respectfully submitted,

Janice Lin
Founder & President

Carl Stills
Interim Executive Director
and Policy Director
GREEN HYDROGEN COALITION

Date: April 19, 2024