



SOUTHWEST GAS CORPORATION

November 8, 2019

Advice Letter No. 1116-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Informational Only Advice Letter – 2018 Risk Spending Accountability Report

Purpose

The purpose of this Advice Letter is to submit Southwest Gas Corporation's (Southwest Gas) information-only Risk Spending Accountability Report (RSAR) in accordance with California Public Utilities Code § 591. There are no tariff sheets associated with this submission.

Background

On April 25, 2019, the Commission approved D.19-04-020, which adopted a Voluntary Risk-Based Decision-Making Framework for use by the small and multi-jurisdictional utilities (SMJU), including Southwest Gas, in their general rate cases. D.19-04-020 also adopted a schedule for the SMJU's to submit their first RSARs after the general rate case proceeding in which funding for risk mitigation spending is authorized. Southwest Gas filed its Test Year 2021 General Rate Case on August 30, 2019 (Application 19-08-015), which included a risk-based decision-making framework and associated funding requests for risk-based infrastructure programs. Pursuant to Ordering Paragraph 13 in D.19-04-020, Southwest Gas' first RSAR will be due on June 30, 2022 for the 2021 reporting period.

Information-Only RSAR

On July 22, 2019, Southwest Gas received a written request from Energy Division Staff to submit an information-only RSAR for the 2018 reporting period by September 2. The Energy Division later granted Southwest Gas an extension to submit its information-only RSAR by November 8, 2019. Included as Attachment A is Southwest Gas' 2018 RSAR.

This Advice Letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

Effective Date

Southwest Gas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1 (Effective pending Energy Division Disposition) pursuant to General Order (GO) 96-B given that this Advice Letter is submitted as information only and is not



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requesting approval, authorization or other relief. Therefore, Southwest Gas respectfully requests that this Advice Letter be effective on November 8, 2019, which is the date submitted.

Protest

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 20 days after the date of this advice submission, and shall be sent by letter via U.S. Mail, facsimile, or electronically. The address for mailing or delivering a protest to the Commission is:

ATTN: Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Email: edtariffunit@cpuc.ca.gov
Facsimile: 415-703-2200

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004, at the same address as above and mailed, emailed or faxed to:

Mr. Justin Lee Brown
Senior Vice President/General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Email: justin.brown@swgas.com
Facsimile: 702-364-3452

Notice

Southwest Gas believes it is exempt from the notice requirements set forth in General Rule 4.2 of GO 96-B, since this Advice Letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule that are currently in effect.

Service

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is mailing copies of this Advice Letter and related tariff sheets to the utilities and interested parties shown on the attached list.



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Communications regarding this submission should be directed to:

Valerie J. Ontiveroz
Regulatory Manager/California
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Telephone: 702-876-7323
Email: valerie.ontiveroz@swgas.com

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachments

ATTACHMENT A

SOUTHWEST GAS CORPORATION (U 905 G) CALIFORNIA 2014 AUTHORIZED DATA FOR 2018 INFORMATION-ONLY RISK SPENDING ACCOUNTABILITY REPORT[1]

	AUTHORIZED[2]			ACTUAL		
	2014 Auth SCA	Accts Excluded	Net Auth 2014 SCA	2018 SCA	Accts Excluded	Net 2018 SCA
Other Gas Supply	\$ 175,163	\$ -	\$ 175,163	\$ 175,670	\$ -	\$ 175,670
Distribution	14,751,791	(233,998)	14,517,793	15,109,708	(8,291)	15,101,417
Customer Accounts	5,111,835	-	5,111,835	3,606,201	-	3,606,201
Customer Service & Information	188,689	-	188,689	48,150	-	48,150
Administrative and General	1,829,398	1,668,352	161,046	2,545,269	2,381,575	163,694
	2014 Auth NCA	Accts Excluded	Net Auth 2014 NCA	2018 NCA	Accts Excluded	Net 2018 NCA
Other Gas Supply	\$ 31,636	\$ -	\$ 31,636	\$ 36,924	\$ -	\$ 36,924
Distribution	2,012,052	(257,994)	1,754,058	2,137,168	(190,181)	2,137,168
Customer Accounts	861,207	-	861,207	635,093	-	635,093
Customer Service & Information	34,079	-	34,079	9,983	-	9,983
Administrative and General	370,728	316,262	54,466	433,408	384,505	48,903
	2014 Auth SLT	Accts Excluded	Net Auth 2014 SLT	2018 SLT	Accts Excluded	Net 2018 SLT
Other Gas Supply	\$ 24,425	\$ -	\$ 24,425	\$ 24,392	\$ -	\$ 24,392
Distribution	2,447,140	(233,544)	2,213,596	2,659,994	(111,131)	2,659,994
Customer Accounts	564,473	-	564,473	487,144	-	487,144
Customer Service & Information	26,311	-	26,311	4,203	-	4,203
Administrative and General	174,111	139,238	34,873	378,671	348,048	30,623

	Escalated to 2018	Net Actuals 2018 CA
Other Gas Supply	\$ 257,728	\$ 236,986
Distribution	20,604,272	19,898,579
Customer Accounts	7,286,854	4,728,439
Customer Service & Information	277,629	62,336
Administrative and General	279,084	243,220
	<u>\$ 28,705,568</u>	<u>\$ 25,169,559</u>

[1] The above account categories includes spending on safety, reliability and/or maintenance activities. Southwest Gas has made a good faith effort to include only accounts which meet this description. The amounts shown are includes of these activities, but also include other operating activities.

[2] Authorized costs were determined by starting with the costs included in Southwest Gas' last California General Rate Case, A.12-12-024, for the FERC Account categories identified in Note 1 above and escalated for the Company's approved Post-Test Year Margin (PTYM) adjustment filings to determine the 2018 "authorized" amounts in rates.

Distribution List

Advice Letter No. 1116

In conformance with GO 96-B, General Rule 4.3

The following individuals or entities have been served by electronic mail:

Elizabeth Echols, Director
Public Advocates Office
elizabeth.echols@cpuc.ca.gov

Pacific Gas & Electric Company
PGETariffs@pge.com

Southern California Gas Company
ROrtiz@SempraUtilities.com

San Diego Gas & Electric Company
SDG&ETariffs@SempraUtilities.com

Belinda Gatti
Energy Division
California Public Utilities Commission
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Robert M. Pocta
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Pearlie Sabino
Public Advocates Office
California Public Utilities Commission
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ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City: State:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City: State:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	