

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 5, 2015

Advice Letter: 977-G

Southwest Gas Corporation
Attention: Justin Lee Brown
P.O. Box 98510
Las Vegas, NV 89193-8510

SUBJECT: To Update Form 880.0 to Identify its use for the Company's So. Cal. and Create a New Form 880.0 for the Company's No. Cal. and So. Lake Tahoe Service Areas

Dear Mr. Brown:

Advice Letter 977-G is effective as of July 22, 2015.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division



SOUTHWEST GAS CORPORATION

Justin Lee Brown, Vice President/Regulation and Public Affairs

June 22, 2015

ATTN: Tariff Unit, Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Room 4005
San Francisco, CA 94102

Subject: Southwest Gas Corporation (U 905 G)
Advice Letter No. 977

Enclosed herewith is one (1) copy of Southwest Gas Corporation's Advice Letter No. 977, together with California Gas Tariff Sheet Nos. 5, 249, 251, 254-256, 260, 265, 272, and 291-291.1.

Sincerely,

Justin Lee Brown
Vice President/Regulation & Public Affairs

JLB:jjp
Enclosures



SOUTHWEST GAS CORPORATION

Advice Letter No. 977

June 22, 2015

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Southwest Gas Corporation (Southwest Gas) (U 905 G) tenders herewith for filing the following tariff sheets:

Cal. P.U.C. Sheet No.	California Gas Tariff Title of Sheet	Canceling Cal. P.U.C. Sheet No.
11th Revised Sheet No. 5	Table of Contents (<i>Continued</i>)	10th Revised Sheet No. 5
4th Revised Sheet No. 249	Rule No. 21 – Transportation of Customer-Secured Natural Gas	3rd Revised Sheet No. 249
3rd Revised Sheet No. 251	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	2nd Revised Sheet No. 251
2nd Revised Sheet No. 254	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	1st Revised Sheet No. 254
1st Revised Sheet No. 255	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	Original Sheet No. 255
2nd Revised Sheet No. 256	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	1st Revised Sheet No. 256
1st Revised Sheet No. 260	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	Original Sheet No. 260
2nd Revised Sheet No. 265	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	1st Revised Sheet No. 265
1st Revised Sheet No. 272	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	Original Sheet No. 272
3rd Revised Sheet No. 291	Imbalance Trading Request – Southern California (03/2015)	2nd Revised Sheet No. 291
Original Sheet No. 291.1	Imbalance Trading Request – Northern California / South Lake Tahoe (03/2015)	



Purpose

The purpose of this filing is to revise Rule No. 21 – Transportation of Customer-Secured Natural Gas to clarify imbalance trading activity within the Company's Southern California service area (Southern System) and Northern California and South Lake Tahoe service areas (Northern System). As a result, the current Form No. 880.0 (Imbalance Trading Request) will be replaced with Form No. 880.0SCA (Imbalance Trading Request-Southern California) and a new Form No. 880.0NCA (Imbalance Trading Request-Northern California/South Lake Tahoe) is being added.

Additionally, other ministerial revisions have been incorporated to correct minor typographical errors and incorrect references.

These changes 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 2 (effective after Energy Division approval) pursuant to General Order 96-B. Southwest Gas respectfully requests that the tariff sheets filed herein be made effective as soon as possible and no later than July 22, 2015.

Protest

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

Energy Division
California Public Utilities Commission
Attention: Investigation, Monitoring & Compliance Program Manager
505 Van Ness Avenue, Room 4002
San Francisco, CA 94102
E-mail: 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 or faxed to:

Mr. Justin Lee Brown
Vice President/Regulation & Public Affairs
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, Nevada 89193-8510
Facsimile: 702-364-3452



Advice Letter No. 977
Page 3
June 22, 2015

Notice

Noticing is not required pursuant to General Rule 4.2 in G.O. 96-B, since this advice letter is not requesting higher rates or charges, or more restrictive terms or conditions, than those currently in effect.

Service

In accordance with G.O. 96-B, General Rule 4.3, Southwest Gas is mailing copies of this advice letter and related tariff sheets to the utilities and interested parties shown on the attached list.

Communications regarding this filing 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
E-mail: valerie.ontiveroz@swgas.com

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By:

A handwritten signature in blue ink, appearing to read "Justin Lee Brown", written over a horizontal line.

Justin Lee Brown

Attachments

Distribution List

Advice Letter No. 977

In conformance with General Order 96-B, General Rule 4.3

The following individual has been served by regular, first-class mail:

Joe Como, Acting Director
Office of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94105

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

Pacific Gas & Electric Company
PGETariffs@pge.com

Southern California Gas Company
SNewsom@semprautilities.com

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

Robert M. Pocta
Office of Ratepayer Advocates
California Public Utilities Commission
rmp@cpuc.ca.gov

Nathaniel Skinner
Office of Ratepayer Advocates
California Public Utilities Commission
nws@cpuc.ca.gov

Pearlie Sabino
Office of Ratepayer Advocates
California Public Utilities Commission
pzs@cpuc.ca.gov

CALIFORNIA PUBLIC UTILITIES COMMISSION

**ADVICE LETTER FILING SUMMARY
ENERGY UTILITY**

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

Company name/CPUC Utility No. **Southwest Gas Corporation (U 905G)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: **Valerie Ontiveroz**

Phone #: **(702) 876-7323**

E-mail: **valerie.ontiveroz@swgas.com**

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **977**

Subject of AL: **To update Form 880.0 to identify its use for the Company's Southern California and create a new Form 880.0 for the Company's Northern California and South Lake Tahoe service areas.**

Keywords (choose from CPUC listing): **Forms Update**

AL filing type: Monthly Quarterly Annual One-Time Other

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL **Not applicable**

Summarize differences between the AL and the prior withdrawn or rejected AL¹: **Not applicable**

Resolution Required? Yes No

Requested effective date: **July 22, 2015**

No. of tariff sheets: **11**

Estimated system annual revenue effect: (%): **Not applicable**

Estimated system average rate effect (%): **Not applicable**

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: **Not applicable**

Service affected and changes proposed¹: **See 'Subject of AL' above**

Pending advice letters that revise the same tariff sheets: **Not applicable**

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

**CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
E-mail: edtariffunit@cpuc.ca.gov**

**Utility Info (including e-mail)
Mr. Justin Lee Brown,
Vice-President/Regulation & Public Affairs
Southwest Gas Corporation
P. O. Box 98510
Las Vegas, NV 89193-8510
E-mail: justin.brown@swgas.com
Facsimile: 702-364-3452**

¹ Discuss in AL if more space is needed.

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RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS

This Rule describes the general terms and conditions that apply whenever the Company transports Customer-Secured Gas through its system. Customers electing to secure Biomethane Gas from a Biomethane Gas supplier that is also interconnected with the Company's system may only do so if such Biomethane Gas supplier complies with all terms and conditions set forth in Rule No. 22, Biomethane Gas, of this California Gas Tariff.

A. CHARACTER OF SERVICE

1. The basic transportation service rendered under Schedule Nos. GS-70/GN-70/SLT-70, GS-VIC, GS-LUZ, and GN-T shall consist of:
 - a. The receipt by the Company for the account of the customer of gas at the interconnection between the Company, and its upstream pipeline supplier [herein called receipt point(s)].
 - b. The transportation of the customer's gas through the Company's system for the account of the customer; and
 - c. The delivery of the customer's gas after transportation by the Company for the account of the customer at the delivery point(s) into the customer's facility.
2. Core transportation customers in the Company's Southern California service areas, including groups aggregating core loads, will be allocated a pro rata share of the Commission regulated gas storage services that are available to the Company. The Company will inform the customer or Aggregator of the monthly and daily storage entitlement available to that customer or group.

The Company's Southern California core transportation customers may inject gas into storage from April 1 to October 31 and may withdraw gas from storage from November 1 to March 31. The customer must inform the Company of the customer's storage injection schedule by the 23rd day of the month prior to actual gas injection. Daily storage injection nominations may not exceed 110% percent of the month's average daily storage injection quantity. Customers are not required to provide a monthly storage withdrawal nomination, but must provide the Company an estimate of the quantity expected to be withdrawn each month. Daily nominations for storage injections and withdrawals require a 48 hour advance notice.

RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS

(Continued)

A. CHARACTER OF SERVICE (Continued)

4. Gas transported under Schedule Nos. GS-70/GN-70/SLT-70, GS-VIC, GS-LUZ, and GN-T shall be for use only by the customer, unless the Commission has specifically authorized the customer otherwise to resell such transported gas. Service under the provisions of Schedule No. GN-T shall not constitute the dedication of the Company's pipeline system or any portion thereof to the customer.

B. GAS SPECIFICATIONS

1. Unless otherwise agreed to by both parties, the gas delivered to the Company must meet the quality specifications required by the Company's upstream pipeline supplier(s).
2. It must also be at the pressure (See Rule No. 2 of this California Gas Tariff) and have the value specified in the customer's transportation service agreement.

C. QUANTITIES OF GAS

1. The Company shall not be obligated to accept customer's gas in excess of amounts it advises customer it can accept. The Company shall not be required to continue to accept gas at any receipt point when the daily flow rate at that receipt point(s) is less than 50 Mcf per day.
2. North American Energy Standards Board timelines will be followed regarding nominating, confirming and scheduling gas receipts and deliveries as they may be revised by the FERC from time to time. The customer shall be responsible for contacting the upstream interstate pipeline(s) to arrange for the nominating and scheduling of receipts and deliveries hereunder, provided; however, that the customer may designate one party to serve as its Agent for such purpose. In the Company's Southern California service area, such contact shall be made to the Company. The Company and upstream interstate pipeline(s) require that specific information be provided to successfully process each nomination. It is the customer's or their Agent's responsibility to satisfy the information requirements.

Nominations Made Directly to the Upstream Interstate Pipeline(s): If the customer nominates directly to the upstream interstate pipeline(s), the customer or Agent must provide their nomination(s) to the Company utilizing a method that is mutually agreeable to both the customer and Southwest Gas prior to the nomination deadlines set forth below:

RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS
(Continued)

C. QUANTITIES OF GAS (Continued)

6. Balancing of thermally equivalent volumes of gas received and delivered shall be achieved as nearly as feasible on a daily basis, taking into account the customer's right, subject to the Company's approval, to vary receipts and deliveries within specified limits. Deliveries shall be those volumes which have passed the point(s) of delivery as determined by the Company's meter. Except for core customers aggregating load, any Cumulative Imbalance shall be carried forward to the next calendar month and shall be considered first through the meter during the next calendar month. Cumulative imbalances for core customers aggregating load shall be carried forward to the second following calendar month and shall be considered first through the meter during the second following calendar month.
7. The customer may elect to offset any imbalance against: (1) imbalances created by other customers of the Company; (2) in the case of core customers, the customer's or core aggregator's available storage account capacity or inventory for the Company's Southern California service area, if sufficient; or (3) imbalances created by customers served directly by Southern California Gas Company for customers in the Company's Southern California service area. Such offsets must be accomplished prior to the end of the authorized trading period. All trading of imbalances shall be conducted in accordance with Sections D and E of this rule.

D. TRADING OF IMBALANCE QUANTITIES

The customer may elect to offset an imbalance by identifying and reaching an agreement with one or more transportation customers in the Company's Southern California service area that have established imbalances in an opposite direction. Alternatively, customers may also identify and reach agreement with transportation customers served directly by Southern California Gas Company, subject to authorization by the Company. Core customers, including customers aggregating core loads, may also offset imbalances with available storage account quantities held by that customer or group of customers for the Company's Southern California service area, if sufficient. Customers that agree to trade imbalances will be subject to the following conditions:

1. Customers will be entitled to trade their entire Cumulative Imbalance for a given month.

RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS
(Continued)

D. TRADING OF IMBALANCE QUANTITIES (Continued)

2. Trading of imbalance quantities by customers may begin at 7:00 a.m. Pacific Clock Time on the 25th calendar day in the month of notification and must be completed by 3:00 p.m. Pacific Clock Time of the 30th day of the month in which the customer's imbalance statement is rendered. During the month of February, the trading period begins at 7:00 a.m. Pacific Clock Time on the 23rd calendar day of the month and ends at 3:00 p.m. Pacific Clock Time on the 28th calendar day of the month. If the end of the trading period falls on a weekend or holiday, the prior business day shall be the last day for trading to occur.
3. Trading of imbalance quantities may reduce a customer's imbalance toward, but not beyond, a zero imbalance level. A customer may not trade to establish an imbalance in the opposite direction of the customer's original imbalance.
4. Cumulative Imbalances for customers with multiple meters will be determined by aggregating all meters included under a particular transportation service agreement. Customers with multiple meters will not be allowed to trade imbalances based on individual meters or sales accounts.
5. The customer is solely responsible for contacting other transportation customers of the Company or of Southern California Gas Company to explore opportunities for trading imbalances. The customer is also solely responsible for any financial arrangements between trading partners occurring as a result of the completion of an imbalance trade.
6. Customers wishing to execute a trade of imbalance quantities must submit an Imbalance Trading (Form No. 880.OSCA for Southern California service area customers or Form No. 880.00NCA for Northern California and South Lake Tahoe service area customers) to the Company by the imbalance trading deadline. Such form shall be directed to a location specified by the Company. The Company will review, and approve as appropriate, all imbalance trading requests submitted by customers. Customers whose trade requests are approved will be sent revised transportation billing worksheets and invoices. The Company will not be responsible for, or involved with, the transfer of gas supply between customers or any related compensatory transactions between customers.

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RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS
(Continued)

D. TRADING OF IMBALANCE QUANTITIES (Continued)

7. In the event a Southern California service area customer is proposing an imbalance trade with a customer served directly by Southern California Gas Company, the Company will act as the trading partner with the Southern California Gas Company customer on behalf of the Company's customer. Such trade will be subject to prior authorization by the Company and Southern California Gas Company tariff provisions.
8. For the Company's Southern California service area, except during any period of system curtailment of core service as described in Rule No. 20 of this California Gas Tariff, core transportation customers, including those customers aggregating core loads, may use their available storage inventory capacity and quantities to: (1) offset the customer's own transportation imbalances; or (2) trade with other core customers served by the Company for their transportation imbalances. Core transportation customers may not trade storage capacity or quantities with customers served directly by Southern California Gas Company. Core customers trading imbalances with storage service must have sufficient capacity or inventory during the month the imbalance is created and at the time the trade is completed.

E. PAYMENT FOR IMBALANCES BETWEEN GAS RECEIVED AND GAS DELIVERED

1. After the imbalance trading period, the difference between actual monthly deliveries and metered usage, adjusted for any previous imbalances, will be the customer's Cumulative Imbalance. Cumulative Imbalances at the end of the billing period within plus or minus 10 percent of the total metered gas usage will be allowed without penalty. Incremental imbalances in excess of plus or minus 10 percent of total metered gas usage are defined as Excess Imbalances. In addition to the charges payable under the customer's otherwise applicable rate schedules, monthly imbalance volumes shall be billed as follows:

a. Positive Excess Imbalance

When transportation volumes received by the Company are greater than 110 percent of the customer's metered usage and the Excess Imbalance is not eliminated through imbalance trading, the lower of the following shall be applied to the Excess Imbalance and credited to the customer's bill:

RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS
(Continued)

G. BILLING AND PAYMENT

1. The Company shall render a bill to the customer, agent or Aggregator, whichever is applicable, on or before the 10th day of each month.
2. For customers aggregating core loads, any imbalance charges pursuant to Section E of this Rule will be billed to the customer's Aggregator. The customer shall be ultimately responsible for all billings. Additional billing and payment terms and conditions for core aggregation are set forth in Section M of this Rule.
3. Transportation customers that are not part of core aggregating groups shall pay on or before the 25th day of each month for the service rendered hereunder during the preceding month as billed by the Company. Such payment shall be made in immediately available funds on or before the due date to a depository designated by the Company. If the 25th falls on a day that the designated depository is not open in the normal course of business to receive the customer's payment, then payment shall be made on or before the last business day preceding the 25th day that such depository is available. If presentation of a bill to the customer by the Company is delayed after the 10th day of the month, then the time of payment shall be extended accordingly unless the customer is responsible for such delay.
4. The customer, customer's agent or Aggregator shall reimburse the Company for any charges rendered or billed to the Company by its Supplier(s), by any other upstream transporters and gas gatherers, or by any political subdivisions of the State of California, either before or after termination of the Service Agreement, which the Company, in its sole good faith opinion, determines have been incurred because of the transportation of gas for the customer's account hereunder and should, therefore, appropriately be borne by the customer. Such charges, whether levied in dollars or gas, may include, but shall not be limited to, standby charges or reservation fees, prepayments, applicable taxes, applicable fuel reimbursement, shrinkage, lost and unaccounted for volumes, Gas Technology Institute surcharges, penalty charges, and filing fees. The customer will reimburse the Company for all such charges incurred by the Company as rendered, irrespective of the actual quantities of natural gas delivered to the customer.

RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS
(Continued)

M. CORE AGGREGATION TRANSPORTATION (CAT) PROGRAM (Continued)

2. Storage Allocation and Rights

- a. For the Company's Southern California service areas, gas storage inventory injected by Aggregators may not be subjected to encumbrances of any kind. Aggregators will be assigned month-end storage inventory targets by the Company to meet the Company's month-end storage targets and maintain minimum volumes sufficient to meet the Company's peak day and cold year seasonal requirements. Aggregators will not be allowed to withdraw gas in inventory below the month-end targets established by the Company. Gas storage inventory to meet core reliability cannot be used to cure an under-delivery of flowing supplies during an imbalance trading period.
- b. During the injection season, flowing supplies scheduled for injection will be delivered first, with all remaining flowing supplies scheduled for delivery to the Company's Southern California distribution system for current month use.
- c. Aggregators in the Company's Northern California and South Lake Tahoe service areas are subject to the terms and conditions of the Paiute Pipeline Company's FERC Tariff for all storage activities.
- d. When an Aggregator adds a customer or customers to its Group which represents an addition of more than 150,000 therms of storage inventory, a pro rata portion of the existing gas storage inventory will be sold by the Company to the Aggregator at the current month's Procurement Charge as set forth in the currently-effective Schedule No. GCP of this California Gas Tariff. When a customer terminates CAT service which represents a reduction of more than 150,000 therms of storage inventory and returns to the otherwise applicable sales schedule, a pro rata portion of the existing gas storage inventory will be sold by the Aggregator to the Company at the current month's Procurement Charge as set forth in the currently-effective Schedule No. GCP of this California Gas Tariff.

RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS
(Continued)

M. CORE AGGREGATION TRANSPORTATION (CAT) PROGRAM (Continued)

4. Credit & Collection Rights and Obligations (Continued)

d. Billing and Payment Terms (Continued)

- (v) Termination of Service (Aggregator) — Service may be terminated if payment is not received within seven days of the issuance of a delinquency notice, the Company receives any notification that the Aggregator has filed or will be filing any type of bankruptcy or is closing its business.

Upon termination of an Aggregator's participation, the following shall apply:

- (a) The Company will send notices of termination to the Aggregator, each of the Aggregator's customers, and to the Commission.
- (b) The Company will establish an escrow agreement account for collections of outstanding customer payments.
- (c) Any gas that has been delivered into the Company's system on behalf of the Aggregator, including gas in storage, will be used to offset any immediate imbalances.
- (d) The Aggregator will lose its right to a 10 percent tolerance for transportation imbalances and will be required to trade toward a zero imbalance.
- (e) All fees, charges and other obligations of the Aggregator to the Company shall be immediately due and payable and shall be subject to the Company's approved late payment charges.

At the time of termination, the Company shall apply any deposit held on the Aggregator's behalf to recoup unpaid bills. If the deposit does not adequately cover the charges owed by the Aggregator, the customers represented by the Aggregator will be liable for any applicable outstanding charges excluding procurement management charges. The Aggregator shall also be liable for all costs, expenses and attorney's fees incurred by the Company as a result of the Aggregator's termination or default.

IMBALANCE TRADING REQUEST – SOUTHERN CALIFORNIA
(FORM 880.OSCA 06/2015)



SOUTHWEST GAS CORPORATION

IMBALANCE TRADING REQUEST- SOUTHERN CALIFORNIA

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Customer Name _____	Agent Name _____
Email Address _____	Telephone Number _____
Imbalance Month / Year _____	Imbalance Quantity to be Traded _____

Please provide Customer Service Agreement (CSA) for Southwest Gas Customer(s) only.

Seller CSA: _____ **Buyer CSA:** _____

- | | |
|---|---|
| <input type="checkbox"/> SoCalGas Customer | <input type="checkbox"/> SoCalGas Customer |
| <input type="checkbox"/> Core Storage Account | <input type="checkbox"/> Core Storage Account |
| <input type="checkbox"/> Southwest Gas Customer | <input type="checkbox"/> Southwest Gas Customer |

I understand that this Imbalance Trade is contingent on Southwest Gas authorizing the trade. If the Imbalance Trade is with a SoCalGas customer, Southwest Gas will enter into the trade through SoCalGas' imbalance trading program. Imbalance Trading forms must be submitted to Southwest Gas and trades completed prior to 3 p.m. Pacific Clock Time of the 30th of the trading month, or the 28th calendar day during the month of February. If the end of the trading period falls on a weekend or holiday, the prior business day shall be the last day for trading to occur. It is the responsibility of the Southwest Gas customer to ensure any imbalance trades with a SoCalGas customer are entered into the SoCalGas system.

Please email this form to Southwest Gas at:

SWG.GasDispatch@swgas.com

If you have any questions regarding this form or Southern California imbalance trades, please contact the Southwest Gas Scheduling department at 800-762-7626.

Form Submitted by _____
Customer / Agent

Signature _____ Date Signed _____

It is the sole responsibility of each Customer to ensure this form is received at the above address by the trading period deadline.

Form 880.OSCA (06/2015) 1.50 - Microsoft Word

IF ACTUAL COPY OF FORM IS REQUIRED, PLEASE NOTIFY COMPANY

Advice Letter No. 977
Decision No. _____

Issued by
Justin Lee Brown
Vice President

Date Filed June 22, 2015
Effective _____
Resolution No. _____

SOUTHWEST GAS CORPORATION
P.O. Box 98510
Las Vegas, Nevada 89193-8510
California Gas Tariff

Canceling _____ Original _____ Cal. P.U.C. Sheet No. 291.1
Cal. P.U.C. Sheet No. _____

IMBALANCE TRADING REQUEST-NORTHERN CALIFORNIA / SOUTH LAKE TAHOE
(FORM 880.0NCA 06/2015)



SOUTHWEST GAS CORPORATION

IMBALANCE TRADING REQUEST-NORTHERN CALIFORNIA / SOUTH LAKE TAHOE

Seller	Buyer
Customer Contract Number (CSA)	Customer Contract Number (CSA)
Contact / Agent Name	Contact / Agent Name
Contact Telephone Number	Contact Telephone Number
Email Address	Email Address
Imbalance Quantity (Therms)	Imbalance Quantity (Therms)
Imbalance Month	Imbalance Month

I understand that this Imbalance Trade is contingent on Southwest Gas authorizing the trade. Imbalance Trading forms must be submitted to Southwest Gas and trades completed prior to 3 p.m. Pacific Clock Time of the 30th of the trading month, or the 28th calendar day during the month of February. If the end of the trading period falls on a weekend or holiday, the prior business day shall be the last day for trading to occur. Both imbalances must occur during the same time period, unless otherwise agreed to by Southwest Gas. This trade is also contingent on Southwest's verification of the Imbalance Quantity for both customers.

Please email this form to Southwest Gas at:

SWG.GasDispatch@swgas.com

If you have any questions regarding this form or Northern California / South Lake Tahoe imbalance trades, please contact the Southwest Gas Scheduling department at 800-762-7626.

Seller	Buyer
Customer or Agent Signature	Customer or Agent Signature
Printed Name	Printed Name
Customer or Agent Title	Customer or Agent Title
Company Name	Company Name
Date	Date

It is the sole responsibility of each Customer to ensure this form is received at the above address by the trading period deadline.

Form 880.0NCA (06/2015) 150 - Microsoft Word

IF ACTUAL COPY OF FORM IS REQUIRED, PLEASE NOTIFY COMPANY

Advice Letter No. 977
Decision No. _____

Issued by
Justin Lee Brown
Vice President

Date Filed June 22, 2015
Effective _____
Resolution No. _____



SOUTHWEST GAS CORPORATION

July 7, 2015

ATTN: Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Room 4004
San Francisco, CA 94102

RE: Southwest Gas Corporation (U 905 G)
Advice Letter 977
Substitute Sheet Filing

Enclosed are an original and one (1) copy of substitute California P.U.C. Sheet Nos. 5, 291 and 291.1. These sheets were submitted in Advice Letter No. (AL) 977, dated June 22, 2014. AL 977 was filed by Southwest Gas Corporation to revise Rule No. 21 – Transportation of Customer-Secured Natural Gas related to imbalance trading. Additionally, Form No. 880.0 – *Imbalance Trading Request* was replaced with Form No. 880.0SCA – *Imbalance Trading Request-Southern California* and Form No. 880.0NCA – *Imbalance Trading Request-Northern California/South Lake Tahoe* was added to the tariff.

The purpose of this transmittal is to revise an internal department number located at the bottom of the forms from 150 to 521. This revision is used for internal company purposes only and does not change the intent of the form. Tariff Sheet No. 5 has only been modified in conformance with the revisions noted herein.

The substitute sheets are denoted by an asterisk (*).

In accordance with General Order 96-B, General Rule 7.5.1 and Energy Industry Rule 3.2, Southwest is mailing copies of this substitute sheet filing and related tariff sheets to the utilities and interested parties shown on the attached list.

Southwest Gas appreciates your assistance in this matter.

Respectfully,

Valerie J. Ontiveroz
Regulatory Manager/California

c: GO 96-B Service List

Enclosure

Distribution List

Advice Letter No. 977

In conformance with General Order 96-B, General Rule 4.3

The following individual has been served by regular, first-class mail:

Joe Como, Acting Director
Office of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94105

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

Pacific Gas & Electric Company
PGETariffs@pge.com

Southern California Gas Company
SNewsom@semprautilities.com

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

Robert M. Pocta
Office of Ratepayer Advocates
California Public Utilities Commission
rmp@cpuc.ca.gov

Nathaniel Skinner
Office of Ratepayer Advocates
California Public Utilities Commission
nws@cpuc.ca.gov

Pearlie Sabino
Office of Ratepayer Advocates
California Public Utilities Commission
pzs@cpuc.ca.gov

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY
ENERGY UTILITY

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

Company name/CPUC Utility No. **Southwest Gas Corporation (U 905G)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: **Valerie Ontiveroz**

Phone #: **(702) 876-7323**

E-mail: **valerie.ontiveroz@swgas.com**

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **977**

Subject of AL: **Substitute Sheet Filing - To update Form 880.0 to identify its use for the Company's Southern California and create a new Form 880.0 for the Company's Northern California and South Lake Tahoe service areas.**

Keywords (choose from CPUC listing): **Forms Update**

AL filing type: Monthly Quarterly Annual One-Time Other

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL **Not applicable**

Summarize differences between the AL and the prior withdrawn or rejected AL¹: **Not applicable**

Resolution Required? Yes No

Requested effective date: **July 22, 2015**

No. of tariff sheets: **3**

Estimated system annual revenue effect (%): **Not applicable**

Estimated system average rate effect (%): **Not applicable**

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: **Not applicable**

Service affected and changes proposed¹: **See 'Subject of AL' above**

Pending advice letters that revise the same tariff sheets: **Not applicable**

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
E-mail: edtariffunit@cpuc.ca.gov

Utility Info (including e-mail)
Mr. Justin Lee Brown,
Vice-President/Regulation & Public Affairs
Southwest Gas Corporation
P. O. Box 98510
Las Vegas, NV 89193-8510
E-mail: justin.brown@swgas.com
Facsimile: 702-364-3452

¹ Discuss in AL if more space is needed.

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IMBALANCE TRADING REQUEST – SOUTHERN CALIFORNIA
(FORM 880.OSCA 06/2015)



SOUTHWEST GAS CORPORATION

IMBALANCE TRADING REQUEST- SOUTHERN CALIFORNIA

Customer Name _____	Agent Name _____
Email Address _____	Telephone Number _____
Imbalance Month / Year _____	Imbalance Quantity to be Traded _____

Please provide Customer Service Agreement (CSA) for Southwest Gas Customer(s) only.

Seller CSA: _____ **Buyer CSA:** _____

- | | |
|---|---|
| <input type="checkbox"/> SoCalGas Customer | <input type="checkbox"/> SoCalGas Customer |
| <input type="checkbox"/> Core Storage Account | <input type="checkbox"/> Core Storage Account |
| <input type="checkbox"/> Southwest Gas Customer | <input type="checkbox"/> Southwest Gas Customer |

I understand that this Imbalance Trade is contingent on Southwest Gas authorizing the trade. If the Imbalance Trade is with a SoCalGas customer, Southwest Gas will enter into the trade through SoCalGas' imbalance trading program. Imbalance Trading forms must be submitted to Southwest Gas and trades completed prior to 3 p.m. Pacific Clock Time of the 30th of the trading month, or the 28th calendar day during the month of February. If the end of the trading period falls on a weekend or holiday, the prior business day shall be the last day for trading to occur. It is the responsibility of the Southwest Gas customer to ensure any imbalance trades with a SoCalGas customer are entered into the SoCalGas system.

Please email this form to Southwest Gas at:

SWG.GasDispatch@swgas.com

If you have any questions regarding this form or Southern California imbalance trades, please contact the Southwest Gas Scheduling department at 800-762-7626.

Form Submitted by _____
Customer / Agent

Signature _____ Date Signed _____

It is the sole responsibility of each Customer to ensure this form is received at the above address by the trading period deadline.

Form 880.OSCA (06/2015) 521 – Microsoft Word

IF ACTUAL COPY OF FORM IS REQUIRED, PLEASE NOTIFY COMPANY

Advice Letter No. 977
Decision No. _____

Issued by
Justin Lee Brown
Vice President

Date Filed June 22, 2015
Effective _____
Resolution No. _____

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SOUTHWEST GAS CORPORATION
P.O. Box 98510
Las Vegas, Nevada 89193-8510
California Gas Tariff

Canceling _____ Original _____ Cal. P.U.C. Sheet No. 291.1*
Cal. P.U.C. Sheet No. _____

**IMBALANCE TRADING REQUEST-NORTHERN CALIFORNIA / SOUTH LAKE TAHOE
(FORM 880.ONCA 06/2015)**



SOUTHWEST GAS CORPORATION

IMBALANCE TRADING REQUEST-NORTHERN CALIFORNIA / SOUTH LAKE TAHOE

Seller

Buyer

Customer Contract Number (CSA)

Customer Contract Number (CSA)

Contact / Agent Name

Contact / Agent Name

Contact Telephone Number

Contact Telephone Number

Email Address

Email Address

Imbalance Quantity (Therms)

Imbalance Quantity (Therms)

Imbalance Month

Imbalance Month

I understand that this Imbalance Trade is contingent on Southwest Gas authorizing the trade. Imbalance Trading forms must be submitted to Southwest Gas and trades completed prior to 3 p.m. Pacific Clock Time of the 30th of the trading month, or the 28th calendar day during the month of February. If the end of the trading period falls on a weekend or holiday, the prior business day shall be the last day for trading to occur. Both imbalances must occur during the same time period, unless otherwise agreed to by Southwest Gas. This trade is also contingent on Southwest's verification of the Imbalance Quantity for both customers.

Please email this form to Southwest Gas at:

SWG.GasDispatch@swgas.com

If you have any questions regarding this form or Northern California / South Lake Tahoe imbalance trades, please contact the Southwest Gas Scheduling department at 800-762-7626.

Seller

Buyer

Customer or Agent Signature

Customer or Agent Signature

Printed Name

Printed Name

Customer or Agent Title

Customer or Agent Title

Company Name

Company Name

Date

Date

It is the sole responsibility of each Customer to ensure this form is received at the above address by the trading period deadline.

Form 880.ONCA (06/2015) 521 - Microsoft Word

IF ACTUAL COPY OF FORM IS REQUIRED, PLEASE NOTIFY COMPANY

Advice Letter No. 977
Decision No. _____

Issued by
Justin Lee Brown
Vice President

Date Filed June 22, 2015
Effective _____
Resolution No. _____