

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



October 3, 2016

Advice Letter: 1017-G

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

**SUBJECT: To Modify Table 1 - Concentration Standards from Biomethane Gas Constituents
in Rule No. 22**

Dear Mr. Brown:

Advice Letter 1017-G is effective as of September 7, 2016.

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

September 7, 2016

ATTN: Tariff Unit, Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Subject: Southwest Gas Corporation (U 905 G)
Advice Letter No. 1017

Enclosed herewith is one (1) copy of Southwest Gas Corporation's Advice Letter No. 1017, together with California Gas Tariff Sheet No. 279.1.

Sincerely,

Valerie J. Ontiveroz
Regulatory Manager/California

VJO:dm
Enclosures



SOUTHWEST GAS CORPORATION

Advice Letter No. 1017

September 7, 2016

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Southwest Gas Corporation (Southwest Gas or Company) (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.
2nd Revised Sheet No. 279.1	Rule No. 22 – Biomethane Gas (Continued)	1 st Revised Sheet No. 279.1

Purpose

The purpose of this filing is to modify Table 1 – Concentration Standards for Biomethane Gas Constituents in Rule No. 22 – Biomethane Gas, specific to the trigger level for the Biologicals Constituent.

Background

Assembly Bill (AB) 1900 required the California Public Utilities Commission (Commission) to approve standards and requirements for health, safety and pipeline integrity for biomethane gas injected into gas utility pipelines, and rules ensuring nondiscriminatory open access. Per Decision (D.) 14-01-034¹, issued on January 22, 2014, the Commission identified 17 constituents of concern related to biomethane gas, and adopted the monitoring, testing and reporting, and recordkeeping protocols. Southwest Gas' AL 933-A, effective October 21, 2014, incorporated into the Company's tariff the biomethane gas constituents of concern, their respective concentration standards, and the monitoring, testing, reporting and recordkeeping requirements.

Consistent with D.14-10-034, Southwest Gas' tariff currently identifies the trigger level for Biologicals as "4x10⁴/scf (qPCR per APB, SRB, IOB group) and Free of <0.2 micron filter." However, the other California gas utilities² tariffs identify the trigger level for Biologicals as "4x10⁴/scf (qPCR per APB, SRB, IOB group) and commercially free of bacteria of >0.2 microns." Although stated differently, both trigger levels mean the same – Southwest

¹ Issued in Order Instituting Rulemaking 13-02-008 to Adopt Biomethane Standards and Requirements, Pipeline Open Access Rules, and Related Enforcement Provisions.

² Southern California Gas Company, Rule No. 30 – Transportation of Customer-Owned Gas; San Diego Gas & Electric Company, Rule No. 30 – Transportation of Customer-Owned Gas; and Pacific Gas and Electric Company, Gas Rules No. 21, Transportation of Natural Gas.



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Gas' criteria identifies the necessary filter size to remove Biologicals of a certain size, while the latter criteria focuses on the size of the bacteria to be removed. The purpose of the trigger level is to restrict large particulate matter from entering the utility's pipeline system. Therefore, Southwest Gas' proposed tariff revision is appropriate from a pipeline integrity perspective and will more clearly indicate the intent of the trigger level and level of processing required of biomethane gas.

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

Effective Date

Southwest Gas believes this AL is subject to Energy Division disposition and should be classified as Tier 1 (Effective Pending Disposition) pursuant to General Order (G.O.) 96-B since the revisions noted herein are made in accordance with D.14-01-034. Southwest Gas respectfully requests that this AL be made effective September 7, 2016, which is the date filed.

Protest

Anyone may protest this Advice Letter to the 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 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:

ATTN: Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
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, NV 89193-8510
Facsimile: 702-364-3452



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Notice

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 in GO 96-B since this Advice Letter is filed in accordance with previously authorized procedures as noted herein.

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 distribution list and all individuals listed on the official service list in R.16-07-006.

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. 1017

In conformance with GO 96-B, General Rule 4.3

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

Elizabeth Echols, 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 905 G)	
Utility type: <input type="checkbox"/> ELC <input checked="" type="checkbox"/> GAS <input type="checkbox"/> PLC <input type="checkbox"/> HEAT <input type="checkbox"/> WATER	Contact Person: Valerie J. 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) #: 1017	
Subject of AL: To modify Table 1 – Concentration Standards for Biomethane Gas Constituents in Rule No. 22.	
Keywords (choose from CPUC listing): Rule	
AL filing type: <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Annual <input checked="" type="checkbox"/> One-Time <input type="checkbox"/> 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 AL ¹ : Not applicable	
Resolution Required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Requested effective date: September 7, 2016	No. of tariff sheets: 1
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: None	
Service affected and changes proposed ³ : 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	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

³ Discuss in AL if more space is needed.

RULE NO. 22

BIOMETHANE GAS
(Continued)

B. BIOMETHANE GAS SPECIFICATIONS (Continued)

Table 1 ¹ Concentration Standards for Biomethane Gas Constituents			
Constituent	Trigger Level	Lower Action Level	Upper Action Level
Health Protective Constituents			
<u>Carcinogenic</u>			
Arsenic	0.019 (0.006)	0.19 (0.06)	0.48 (0.15)
p-Dichlorobenzenes	5.7 (0.95)	57 (9.5)	140 (24)
Ethylbenzene	26 (6.0)	260 (60)	650 (150)
n-Nitroso-di-n-propylamine	0.033 (0.006)	0.33 (0.06)	0.81 (0.15)
Vinyl Chloride	0.84 (0.33)	8.4 (3.3)	21 (8.3)
<u>Non-Carcinogenic</u>			
Antimony	0.60 (0.12)	6.0 (1.2)	30 (6.1)
Copper	0.060 (0.02)	0.60 (0.23)	3.0 (1.2)
Hydrogen Sulfide	30 (22)	300 (216)	1,500 (1,080)
Lead	0.075 (0.009)	0.75 (0.09)	3.8 (0.44)
Methacrolein	1.1 (0.37)	11 (3.7)	53 (18)
Alkyl Thiols (Mercaptans)	N/A (12)	N/A (120)	N/A (610)
Toluene	904 (240)	9,000 (2,400)	45,000 (12,000)
<u>Pipeline Integrity Protective Constituents¹</u>			
Siloxanes	0.01 mg Si/m ³	0.1 mg Si/m ³	-
Ammonia	0.001%	-	-
Hydrogen	0.1%	-	-
Mercury	0.08 mg/m ³	-	-
Biologicals	4 x 10 ⁴ /scf (qPCR per APB, SRB, IOB group ²) and commercially free of bacteria of >0.2 microns	-	-

¹ The first number in Table 1, Health Protective Constituents, are in mg/m³, while the second number in () is in ppm_v.

² The Pipeline Integrity Protective Constituent Lower and Upper Action Level limits will be established in the Commission's next update proceeding. Until that time, Biomethane Gas that contains Pipeline Integrity Protective Constituents exceeding the Trigger Level, but lacking a Lower or Upper Action Level, will be analyzed and addressed on a case-by-case basis based on the Biomethane Gas' potential impact on the Company's pipeline system integrity. The Lower Action Level may be set at concentration levels equal or greater than the Trigger Level.

³ Acid-producing Bacteria [APB], Sulfate-reducing Bacteria [SRB], and Iron-oxidizing Bacteria [IOB]