

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 5, 2018

Advice Letter 1071-G

Justin Lee Brown
Vice-President/Regulatory Affairs
Southwest Gas Corporation
PO Box 98510
Las Vegas, NV 89193-8510

SUBJECT: California Affiliate Transaction Rules Updated Compliance Plan.

Dear Mr. Brown:

Advice Letter 1071-G is effective as of May 1, 2018.

Sincerely,

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

Edward Randolph
Director, Energy Division



SOUTHWEST GAS CORPORATION

May 1, 2018

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. 1071

Enclosed herewith are original and one (1) copy of Southwest Gas Corporation's Advice Letter No. 1071. There are no tariff sheets associated with this filing.

Sincerely,


Valerie J. Ontiveroz
Regulatory Manager/California

Enclosures



SOUTHWEST GAS CORPORATION

Advice Letter No. 1071

May 1, 2018

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Southwest Gas Corporation (Southwest Gas or Company) herewith submits Advice Letter No. 1071. There are no tariff sheets associated with this filing.

Purpose

The purpose of this Advice Letter is to replace Southwest Gas' previously filed California Affiliate Transaction Rules Compliance Plan (Plan). While Southwest Gas has not made any material changes to its Plan, it is filing this revised Plan to reflect recent affiliate officer and director changes.

Southwest Gas hereby submits its revised Plan in accordance with both Ordering Paragraph (OP) 2 and Section VI.A of Appendix A of Commission Decision (D.) 97-12-088, as modified by D.98-08-035. The attached Plan presents the most current information for Southwest Gas regarding its affiliates and its affiliate transaction rules compliance efforts, and supersedes all previously submitted Plans.

Background

The Commission's Rules, adopted by D.97-12-088 and modified by D.98-08-035, govern the relationship between Southwest Gas and its applicable affiliates. The Rules apply to utility transactions with California affiliates engaging in the provision of a product that uses gas or the provision of services that relates to the use of gas, unless otherwise exempted from the Rules.

OP 2 of D.97-12-088 and Section VI.A of the Rules both required affected utilities to file by advice letter, no later than December 31, 1997, a compliance plan demonstrating that there are adequate procedures in place that will preclude the sharing of information as prohibited by the Rules. Utilities must submit a revised compliance plan annually using the same advice letter process when there is a change to an existing compliance plan.

Pursuant to D.97-12-088, Southwest Gas developed and filed with the Commission, in Advice Letter Nos. 562-A and 562-B, a Plan designed to address the interaction between Southwest Gas' public utility operations and its non-exempt affiliates. Subsequent to the filing of Advice Letter No. 562-B, Southwest Gas developed written policies and practices necessary to ensure compliance with each of the subject areas identified in the Rules. These policies and practices are identified as Corporate Policy & Practice (CPP) 1000.01 and Standard Practice (SP) 105.1, and were filed as amendments to Southwest Gas' Plan in Advice Letter No. 698. Copies of the CPP and SP are attached hereto as Attachments A and B, respectively. A list that includes key information for the Southwest Gas subsidiaries and affiliates that operate in California, share officers or directors with the utility, or for which Southwest Gas has received an exemption from the Rules completes the Plan and is attached as Attachment C.¹

¹ Southwest Gas is also providing a redline version of Attachment "C" with this filing.



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Southwest Gas believes that the compliance actions set forth in the attached revised Plan are consistent with the Commission's Rules, as delineated in D.97-12-088 and modified by D.98-08-035.

Southwest Gas does not believe there are unusual or unique circumstances that would require affiliate transaction rule measures beyond those already identified by Southwest Gas in its Plan. Therefore, Southwest Gas will apply the provisions of its Plan to any and all transactions between the utility and its non-exempt California affiliates.

Southwest Gas will inform the Energy Division of any material changes in its exempt affiliates and will follow the procedures set forth in Section VI.B of the Rules upon the creation of a California affiliate that is subject to the Rules.

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 disposition) pursuant to General Order (GO) 96-B. Southwest Gas respectfully requests that this Advice Letter become effective May 1, 2018, the date of filing.

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 filing, 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:

Attention: Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, California 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 (same address as above).

Protests and all other correspondence regarding this Advice Letter should also be sent by letter and transmitted via facsimile or electronic mail to the attention of:



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Catherine M. Mazzeo, Esq.
Assistant General Counsel
P.O. Box 98510
Las Vegas, Nevada 89193-8510
Telephone No. (702) 876-7250
Facsimile No. (702) 252-7283
E-mail: catherine.mazzeo@swgas.com

Justin Lee Brown
Vice President, Regulation & Public Affairs
P.O. Box 98510
Las Vegas, Nevada 89193-8510
Telephone No. (702) 876-7183
Facsimile No. (702) 364-3452
E-mail: justin.brown@swgas.com

Notice

Southwest Gas 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 serving copies of this Advice Letter to the interested parties shown on the list. In addition, and pursuant to D.97-12-088, and Sections VI.A and VI.B of the Affiliate Transaction Rules, Southwest Gas is serving copies of this Advice Letter to the service list from R.97-04-011/I.97-04-012, provided as Attachment D. This Advice Letter is also available for viewing on Southwest Gas' web site at <http://www.swgas.com/en/california-rates-and-regulation>.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By


Justin Lee Brown

Attachments

DISTRIBUTION LIST

Advice Letter No. 1071

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 (email):

Pacific Gas & Electric Company
PG&ETariffs@pge.com

Southern California Gas Company
SNewsom@semprautilities.com
tariffs@socalgas.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

The individuals on the following official service list in R.97-04-011/I.97-04-012 were served by email. Where an email address was not included on the official service list, individuals were served by regular, first-class mail.

Advice Letter No. 1071
Attachment A

SOUTHWEST GAS CORPORATION
(U 905 G)
Corporate Policy & Practice (CPP) 1000.01



CPP 1000.01 California Affiliate Transaction Rules Compliance Plan

Effective Date: 10/06/2003

Last Review Date: 11/25/2015

CPP Owner: Regulation

1. This policy has been developed to ensure that Southwest Gas Corporation (the Company) complies with the California Affiliate Transaction Rules (the Rules) issued by the California Public Utilities Commission (CPUC). The Rules govern transactions between public utilities operating within California and their affiliates that are subject to the Rules. This policy together with the Company's Standard Practice (SP) 105.1 comprise the Company's Compliance Plan.
2. An affiliate is defined by the CPUC as any person, corporation, utility, partnership, company, or other entity of which five percent or more of its outstanding securities is owned, controlled, or held with power to vote, directly or indirectly, either by the Company or any of its affiliates. Transactions between the Company's California public utility operations and any affiliate engaging in the provision of a product that uses gas or in the provision of services that relate to the use of gas within California are subject to the Rules pursuant to Rule No. II.B.
3. [SP 105.1, California Affiliate Transaction Rules Compliance Plan](#), is designed to address transactions between the Company's California public utility operations and any Rule II.B. affiliate transacting business in California. SP 105.1 provides responsibilities, detailed methods, reference to departmental written instructions, and identification of other affected SPs. The Company's Compliance Officer can be contacted if there is any question about the status of an affiliate.

NOTE: The Company has designated the Corporate Compliance Officer of the Corporation as the California Affiliate Transaction Compliance Officer (Compliance Officer), who will coordinate the implementation of this SP in order to ensure compliance with the Rules.
4. **Each manager (equivalent and above)** of the Company is responsible for ensuring that **all employees who transact business with affiliates on behalf of the Company** within his or her area of responsibility be familiar with SP 105.1 and receive a copy of related written policies, procedures, and practices and understand and adhere to them. The **officers of Rule II.B. affiliates** are responsible for implementing procedures within their companies necessary to enforce the Rules. Failure to abide by the Rules as outlined in SP 105.1 can result in disciplinary action or discharge.
5. The Company acknowledges a continuing responsibility to apply the scope of the Rules. If the activities of any of the Company's Rule II.B affiliates change, or if a new affiliate is created, the Company will make the appropriate filing(s) with the CPUC.

* * *

Advice Letter No. 1071
Attachment B

SOUTHWEST GAS CORPORATION
(U 905 G)
Standard Practice (SP) 105.1



SP 105.1 California Affiliate Transaction Rules Compliance Plan

Effective Date: 10/06/2003

Last Review Date: 11/25/2015

SP Owner: Regulation

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Procedure - None

Reference

Purpose

This Standard Practice (SP) provides the responsibilities, detailed methods, and identification of other related documents to support and ensure compliance with the requirements within Corporate Policy & Practice ([CPP 1000.01](#), [California Affiliate Transaction Rules Compliance Plan](#)). This SP describes actions that are required under the California Affiliate Transaction Rules (the Rules) issued by the California Public Utilities Commission (CPUC), and references the applicable section of the Rules. This SP is not, however, a substitute for the Rules themselves. This SP together with CPP 1000.01 comprise Southwest Gas Corporation's (the Company) California Affiliate Transaction Rules Compliance Plan (Compliance Plan).

Definitions

1. Affiliate - An affiliate is defined by the CPUC as any person, corporation, utility, partnership, company, or other entity of which five percent or more of its outstanding securities is owned, controlled, or held with the power to vote, directly or indirectly, either by the Company or any of its affiliates.
2. Rule II.B Affiliate - An affiliate that provides a product that uses natural gas or a service that relates to the use of natural gas. Transactions between the Company's California public utility operations and the Company's Rule II.B affiliates transacting business in California are subject to the Rules.
3. Exempt Affiliate - A Rule II.B affiliate for which the CPUC has granted Company an exemption from the applicability of the Rules.

Policy

1. CPP 1000.01 ensures compliance with the Rules. The Rules govern transactions between public utilities operating within California and their affiliates that are subject to the Rules.
2. This SP is designed to address transactions between the Company's California public utility operations and any non-exempt Rule II.B. affiliate in California. In addition, it provides the responsibilities, detailed methods, and identification of other affected SPs. The Company's Compliance Officer can be contacted if there is any question about the status of an affiliate or the application of this SP.

NOTE: The Company has designated the Corporate Compliance Officer of the Corporation as the California Affiliate Transaction Compliance Officer (Compliance Officer), who will coordinate the implementation of this SP in order to ensure compliance with the Rules.

3. The Company acknowledges a continuing responsibility to apply the scope of the Rules. If activities of the Company's Rule II.B affiliates change, or if a new affiliate is created, the Company will make the appropriate filing with the CPUC.
4. Communication – This SP, CPP 1000.01, and other related SPs are located on the Company's InfoNet Web site for access by employees. If necessary, additional related written policies, procedures, and practices will be provided to officers of the Company's non-exempt Rule II.B affiliates.
5. Rule II.B. Affiliate Transaction Policies and Guidelines – The Compliance Officer will coordinate with affected departments and personnel, as necessary, to ensure the Company's written policies, procedures, and practices comply with the Rules. Specific guidelines will be enacted, as necessary, to

comply with the standards for accounting and record-keeping. Written policies and practices will be adopted, as necessary, to comply with the directives concerning the nondiscriminatory sharing and dissemination of information, appropriate shared services, transfer of employees, nonpreferential and nondiscriminatory service offerings, discounts, business opportunities, and other activities between Rule II.B. affiliates in California and the California public utility operations of the Company.

Scope

This SP applies to all employees of the Company who transact business with affiliates on behalf of the Company.

Responsibility

NOTE: The following responsibilities will apply to transactions between the Company's California public utility operations and its non-exempt Rule II.B. affiliates in California.

1. All Employees transacting business with affiliates on behalf of the Company.

- a. Be familiar with this SP and CPP 1000.01, and adhere to them.
- b. Do not provide preferential treatment to affiliates or customers of affiliates. Apply the Company's tariff uniformly to all market participants. (Rules III.A. and B.3. and 4.)
- c. Limit transactions between the Company and affiliates to those goods and services made generally available by the Company or affiliates to all market participants. (Rule III.B.)
- d. Do not condition or tie the provision of any Company goods or services to the receipt of any goods or services from affiliates. (Rule III.C.)
- e. Do not assign Company customers to any affiliates, whether by default, direct assignment, option, or by any other means, unless such assignment is equally available to all competitors. (Rule III.D.)
- f. Do not solicit business for affiliates or provide any market and/or customer-sensitive information to such affiliates. (Rules III.E, IV.A, IV.B, and IV.E.)
- g. Immediately notify department management if any discount, rebate, or waiver of applicable Company charges for service is provided to affiliates so that the terms and conditions can be properly posted. (Rule III.F.)
- h. Do not provide a list of non-Company service providers, which includes or identifies affiliates, to a customer unless a specific request has been received from the customer and the CPUC has approved such a list. Contact the California Regulatory Manager for the most current, approved list. (Rule IV.C.)
- i. Do not share nonpublic information the Company receives from nonaffiliated suppliers without first obtaining written permission from the supplier. (Rule IV.D.)
- j. Do not share plant, facilities, equipment, services, or information systems with affiliates with the exception of permitted corporate support functions. (Rule V.C.)
- k. Report all transfers and joint purchases between the Company and affiliates to department management. No joint natural gas commodity or capacity purchases with

affiliates are allowed. (Rules V.D. and H.)

l. Do not use shared corporate support functions to transfer confidential, proprietary, or sensitive information from the Company to affiliates. (Rule V.E.)

m. Ensure that employees of the Company are not also employed by an affiliate, except in the role of permitted corporate support. (Rules V.E. and G.)

n. Do not promote or advertise affiliates association with the Company. Notify management of affiliates use of the name or logo of the Company. (Rule V.F.)

o. Execute a California Affiliate Transaction Rules Compliance Plan Work Assignment Agreement, Form 105.1, if temporarily assigned to, permanently hired by, or returning from an affiliate, as outlined in SP 757.1, Personnel Hiring and Transferring. (Rule V.G.)

p. If hired by an affiliate, do not disclose any confidential, proprietary, or sensitive Company information to the affiliate. (Rule V.G.2.d.)

2. Each Manager (equivalent or above) of the Company

a. Ensure employees within your areas of responsibility who are involved with affiliates or matters that impact affiliates are aware of this SP and other related written policies, procedures, and practices.

b. Ensure that employees under your areas of responsibility do not provide preferential treatment to affiliates or customers of affiliates. (Rule III.A.)

c. Immediately notify the Compliance Officer if any discount, rebate, or waiver of applicable Company charges for service(s) is provided to an affiliate. Maintain proper records of all transactions. (Rules III.F.1 -14.)

d. Ensure that employees under your area of responsibility do not provide engineering services (including research and development) to affiliates. (Rule IV.E.)

e. Maintain separate, simultaneous records documenting each transaction between the Company and affiliates. Retain such records for a minimum of three years, consistent with Company document retention practices and CPUC requirements. Make such records available for review upon 72 hours' notice from the Compliance Officer. (Rule IV.F.)

f. Ensure that employees under your area of responsibility do not share services or information systems with affiliates, except for permitted corporate support functions. (Rule V.C.)

g. Ensure that employees under your area of responsibility do not share plant, facilities, or equipment with affiliates, with the exception of permitted corporate support functions (Rule V.C.)

h. Report all joint non-commodity and non-capacity purchases made by the Company with affiliates to the Controller. No joint purchases of natural gas commodity or capacity are permitted. (Rule V.D.)

i. Report all shared corporate support services to the Controller. (Rule V.E.)

j. Ensure that employees under your area of responsibility that are performing permitted

shared corporate services do not transfer confidential, proprietary, or sensitive information about the Company to affiliates, and that permitted shared corporate support services are carried out in accordance with the Rules. (Rule V.E.)

k. Ensure that employees under your area of responsibility do not promote affiliates or conduct any other joint advertising or marketing with affiliates. Report all uses of the Company name and logo by affiliates to the Compliance Officer. (Rule V.F.)

l. Do not jointly employ the same employees as affiliates except as provided for in Rule V.E. (Rule V.G.)

(1) Complete an Employment Status Form 759.7 for each employee temporarily assigned to, permanently hired by, or returning from an affiliate.

(2) Provide Form 105.1 (all four parts) for employee review and completion and attach it to Form 759.7.

(3) Send Form 759.7 and the attached agreement (all four parts) to Human Resources, and send copies of both documents to the Compliance Officer.

m. Notify Human Resources prior to temporarily assigning a Company employee to an affiliate. Do not temporarily assign a Company employee to an affiliate in excess of 30% of such employee's chargeable time in any calendar year. (Rule V.G.2.e.)

n. Do not temporarily assign any Company employee to an energy marketing affiliate. (Rule V.G.2.e.)

o. Report all transfers of goods and services between the Company and affiliates to the Controller and the Compliance Officer. (Rule V.H.)

p. Ensure that employees under your area of responsibility do not offer new nontariffed products and services except through affiliates or as otherwise provided. (Rules VII.A, VII.C, and VII.I.)

q. Immediately notify the Compliance Officer of any new nontariffed products and services, and verify CPUC approval has been obtained prior to offering any new nontariffed products and services to customers. (Rule VII.E.)

r. Immediately notify the Compliance Officer of any sale, lease, assignment, or encumbrance of Company property if Company property is affected in any way as part of a nontariffed product or service offering by the Company. (Rule VII.G.)

3. Compliance Officer

a. Coordinate the implementation and continuous enforcement of the Rules for the Company and its affiliates.

b. Maintain a current copy of this SP and the Rules.

c. Monitor compliance requirements of CPP 1000.01 and this SP and take appropriate action when warranted.

d. Coordinate with other departments as necessary in making records of transactions between the Company and affiliates available within 72 hours for third-party review. (Rule IV.F.)

e. Upon notification from Human Resources that more than five percent of Company employees are assigned to affiliates at any one time, notify the involved managers and affiliates to halt all assignments in excess of the five percent threshold. (Rule V.G.2.)

f. Upon notification that the Company intends to offer any new nontariffed product or service, coordinate with Rates and Regulatory Analysis, Internal Audit, the California Regulatory Manager and other departments, as necessary, to ensure compliance with Rules VII.D and VII.E.

g. Notify the California Regulatory Manager if the Company provides a discount, rebate or waiver of applicable charges for service provided to an affiliate. (Rule III.F.)

4. Rates and Regulatory Analysis

a. Exclude all costs associated with affiliate research and development activities from rates to the Company's California customers. (Rule V.F.5.)

b. Exclude all costs associated with required independent compliance audits from rates to the Company's California customers. (Rule VI.C.)

c. Coordinate with other departments, as necessary, to ensure that all tariffed products and services offered by the Company meet the requirements of Rule VII.C.

5. California Regulatory Manager

a. Ensure that proper electronic notification and/or posting is made if the Company provides a discount, rebate or waiver of applicable charges for service provided to an affiliate. (Rule III.F.)

b. If a list of non-Company service providers that includes or identifies affiliates is developed, ensure that CPUC approval is obtained prior to the list being made available to customers. Maintain any lists of non-Company service providers that includes or identifies affiliates that have been approved by the CPUC. (Rule IV.C.2.)

c. Coordinate with Legal Affairs and the Compliance Officer in accordance with SP 110.0, Communications with State Regulatory Commissions, to file a Compliance Plan with the CPUC Energy Division no later than December 31 of each year (or as otherwise required by the Rules) whenever there has been a change in the Company's existing Compliance Plan or a change in the Company's affiliates. (Rule VI.A.)

d. Upon the creation of a new affiliate, ensure posting of the appropriate electronic notice, and coordinate with Legal Affairs and the Compliance Officer to file an advice letter demonstrating how the Rules will be implemented with respect to the new affiliate, no later than 60 days following the creation of the new affiliate. (Rule VI.B.)

e. Coordinate with Internal Audit and other departments, as necessary, to ensure that the annual independent audit report is filed with the CPUC no later than May 1 of each year. (Rule VI.C.)

f. Ensure Company compliance with filing and reporting requirements for existing and new nontariffed products or services. (Rules VII.C, VII.E, and VII.H.)

6. Controller

- a. Maintain Company books and records separate from affiliate books and records and apply all required accounting standards. (Rule V.B.)
- b. Record all joint purchases of goods and services made by the Company and affiliates in a manner that clearly identifies the Company and affiliate portions of such purchases, and allocate costs according to CPUC guidelines. (Rule V.D.)
- c. Prepare invoices for fees associated with permitted, shared corporate support services provided by the Company to affiliates, and ensure accurate pricing. (Rule V.E.)
- d. Prepare invoices, with information from Human Resources, for fees associated with direct employee movement, and account for such fees in accordance with Rule V.G.2.c. Notify the Compliance Officer prior to billing the affiliate.
- e. Prepare invoices, with information from Human Resources, for fees associated with the temporary use by affiliates of Company employees, and account for such fees. (Rule V.G.2.e.) Notify the Compliance Officer prior to billing the affiliate.
- f. Prepare invoices for goods and services transferred to affiliates by the Company, account for these transfers, and ensure pricing is consistent with the Rules. (Rule V.H.)
- g. Record all transfers or sales of goods and services from affiliates to the Company. (Rule V.H.)

7. Human Resources

- a. Ensure the requirements and practices of SP 757.1, Personnel Hiring and Transferring, are in compliance with the Rules.
- b. Document and report to the Compliance Officer and the Controller permanent or temporary employee movement between the Company and affiliates. Track each temporary assignment to an affiliate. (Rule V.G.2.)
- c. If more than five percent of the Company's employees are assigned to affiliates at any one time, immediately notify the Compliance Officer. (Rule V.G.2.)
- d. When employees are terminated and immediately hired by affiliates, transferred from the Company to affiliates, or returning to the Company for employment from affiliates, ensure Form 759.7 and a signed copy of Form 105.1 have been filed. (Rule V.G.2.)
- e. Ensure employee movement between the Company and affiliates is in compliance with the Rules. (Rule V.G.2.b.)

8. Energy Solutions and Gas Purchases and Transportation

- a. Apply the Company's tariff uniformly to all market participants. (Rules III.B.3 and III.B.4.)
- b. Ensure the Company does not condition or tie the provision of any of its services to the receipt of any goods or services from affiliates. (Rule III.C.)
- c. Ensure the Company does not solicit business, provide any market and/or customer-sensitive information, or give the appearance that the Company speaks for affiliates. (Rules III.E, IV.A, IV.B, and IV.E.)

- d. Ensure the Company does not promote, advertise, or market for or with affiliates. (Rule V.F.1.)
- e. Ensure the Company does not represent that affiliates will receive any different treatment than any other market participant. (Rule V.F.2.)
- f. Ensure the Company does not provide advertising for affiliates unless it provides similar access to all market participants. (Rule V.F.3.)
- g. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)
- h. Notify the Compliance Officer of any new nontariffed product or service prior to offering or providing such product or service (Rule VII.D.)

9. Systems Planning

Ensure the Company does not provide engineering services for affiliates. (Rule IV.E.)

10. Legal Affairs/General Counsel

- a. Serve as a repository of data for the Company for the creation of new affiliates and the dissolution of existing affiliates, and inform the Compliance Officer of any changes to the Company's affiliates. (Rule VI.A and VI.B.)
- b. Ensure the Company and affiliates are separate corporate entities. (Rule V.A.)
- c. Ensure the Company and affiliates do not have any common directors or officers, except as may be permitted by the Rules. (Rule V.G.1.)
- d. Coordinate with the California Regulatory Manager and the Compliance Officer, as necessary, in accordance with SP 110.0, Communications with State Regulatory Commissions, to file a Compliance Plan with the CPUC Energy Division no later than December 31 of each year (or as otherwise required by the Rules) whenever there has been a change in the Company's existing Compliance Plan or a change in the Company's relationship(s) with its affiliates. (Rule VI.A.)
- e. Upon the creation of a new affiliate, coordinate with the California Regulatory Manager and the Compliance Officer, as necessary, to file an advice letter demonstrating how the Rules will be implemented with respect to the new affiliate, no later than 60 days following the creation of the affiliate. (Rule VI.B.)
- f. Ensure the officers and employees of Company affiliates are available to testify upon request of the CPUC. (Rule VI.D.)

11. Corporate Purchasing

- a. Ensure the requirements and practices of SP 190.0, Purchasing Goods, are in compliance with the Rules.
- b. Ensure the Company provides nonpublic information and data which has been received from unaffiliated suppliers to affiliates or unaffiliated entities only after the Company first obtains written affirmative authorization to do so from the supplier. The Company shall not actively solicit the release of such information exclusively to its affiliates while making an effort to keep such information from other unaffiliated entities. (Rule IV.D.)

c. Maintain Company transactions, contracts, and related bid records with affiliates in accordance with the Rules. (Rules IV.F, and IV.G.)

12. Contract Administration

a. Ensure the requirements and practices of SP 195.0, Procuring Services (Corporate Contract Administration), are in compliance with the Rules.

b. Ensure the Company provides nonpublic information and data which has been received from unaffiliated suppliers to affiliates or unaffiliated entities only after the Company first obtains written affirmative authorization to do so from the supplier. The Company shall not actively solicit the release of such information exclusively to its affiliates while making an effort to keep such information from other unaffiliated entities. (Rule IV.D.)

c. Maintain Company transactions, contracts, and related bid records with affiliates in accordance with the Rules. (Rule IV.F, and IV.G.)

13. Internal Audit

a. Contract (at shareholder expense) external auditors to perform an annual audit of the Company's compliance with the Rules. (Rule VI.C.)

b. Ensure periodic audits are performed for nontariffed products and services in compliance with the Rules. (Rule VII.D.4.)

c. Report any areas of non-compliance identified during the annual audit to the Compliance Officer and others as necessary. Obtain responses from the Compliance Officer and others as necessary regarding how such matters are to be addressed. Monitor progress to ensure timely resolution of issues.

14. Corporate & Administrative Services

Ensure the Company does not share plant, facilities, or equipment with affiliates, except for permitted corporate support functions. (Rule V.C.)

15. Corporate Development

a. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)

b. Notify the Compliance Officer of any new nontariffed product or service prior to offering or providing such product or service (Rule VII.D.)

16. Engineering Staff

a. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)

b. Notify the Compliance Officer of any new nontariffed product or service prior to offering or providing such product or service (Rule VII.D.)

PROCEDURE - None

Reference

Corporate Policy & Practice

[1000.01 - California Affiliate Transaction Rules Compliance Plan](#)

Standard Practices

[110.0 - Communications with State Regulatory Commissions](#)

[190.0 - Purchasing Goods](#)

[195.0 - Procuring Services \(Corporate Contract Administration\)](#)

[757.1 - Personnel Hiring and Transferring](#)

Forms

105.1 California Affiliate Transaction Rules Compliance Plan Work Assignment Agreement (computer-produced [Microsoft Word](#) form only)

759.7 Employment Status (computer-produced [Microsoft Word](#) form also available)

Other

California Affiliate Transaction Rules

* * *

Advice Letter No. 1071
Attachment C

SOUTHWEST GAS CORPORATION
(U 905 G)
Summary of Affiliates

**SOUTHWEST GAS CORPORATION
ADVICE LETTER NO. 1071
ATTACHMENT C
SUMMARY OF AFFILIATES**

Name	Headquarters Business Address	Primary Officers	Business Activity	Affiliate Transaction Rules Status
Carson Water Company (Carson Water)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	<ul style="list-style-type: none"> * John P. Hester, Chairman of the Board/Chief Executive Officer * Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/Chief Counsel/Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary 	Holding company	Exempt per D.99-02-086
Centuri Construction Group, Inc. (formerly Isleworth Holding Company)	2355 West Utopia Road Phoenix, AZ 85027-4167	<ul style="list-style-type: none"> * John P. Hester, Chairman of the Board Paul M. Daily, President/Chief Executive Officer Rock L. McHenry, Executive Vice President/Chief Customer Officer Kevin L. Neill, Vice President/Chief Financial Officer/Treasurer Ricardo B. Pringle, Executive Vice President/Chief Counsel/Corporate Secretary Michael M. Cicchella, Jr., Executive Vice President/Chief Administrative Officer Jill L. Blair, Assistant Corporate Secretary * Cheryl A. Wurst, Assistant Corporate Secretary 	Holding company	Rule II.B affiliate
IntelliChoice Energy LLC (IntelliChoice)	2355 West Utopia Road Phoenix, AZ 85027-4167	John Cole, Chief Executive Officer Tommis Young, Chief Technology Officer	Joint venture. Majority-owned subsidiary of NPL. Formed to market and commercialize natural gas-fired heat pump technology.	Limited exemption per D.10-09-005
IntelliChoice Energy of California LLC	2355 West Utopia Road Phoenix, AZ 85027-4167	Not Applicable	Wholly-owned subsidiary of IntelliChoice, formed to market/commercialize natural gas-fired pump heat technology in California	Rule II.B affiliate
NPL Construction Co. (NPL)	2355 West Utopia Road Phoenix, AZ 85027-4167	Paul M. Daily, Chief Executive Officer Mark S. Wambach, President Kevin L. Neill, Treasurer Ricardo B. Pringle, Corporate Secretary Donald W. Harris, Assistant Corporate Secretary - Illinois Operations Jill L. Blair, Assistant Corporate Secretary * Cheryl A. Wurst, Assistant Corporate Secretary	Full service pipeline distribution system contractor.	Exempt per D.99-11-016
Paiute Pipeline Company (Paiute)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	<ul style="list-style-type: none"> * John P. Hester, Chairman of the Board/Chief Executive Officer * Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Justin Lee Brown, Vice President/Regulation and Public Affairs * Kenneth J. Kenny, Vice President/Finance/Treasurer * Mark Litwin, Vice President/General Manager Cheryl A. Wurst, Assistant Corporate Secretary 	FERC jurisdictional interstate natural gas pipeline. Paiute's system extends from the Idaho-Nevada border to the Nevada-California border.	Exempt per D.99-02-086
Southwest Administrators, Inc. (SA)	2355 West Utopia Road Phoenix, AZ 85027-4167	Mark S. Wambach, President James W. Connell, Jr., Vice President Duane T. Stott, Vice President Ricardo B. Pringle, Secretary Kevin L. Neill, Treasurer Jill L. Blair, Assistant Corporate Secretary A. Dawn Herman, Assistant Corporate Secretary	Wholly owned subsidiary of NPL. Formed to provide pipeline construction service in California.	Rule II.B affiliate. Limited exemption per D.99-11-016 for transactions outside of California
Southwest Gas Holdings, Inc.	5241 Spring Mountain Road	Michael J. Melarkey, Chairman of the Board <ul style="list-style-type: none"> * John P. Hester, President/Chief Executive Officer * Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Lori L. Colvin, Vice President/Controller/Chief Accounting Officer * Boyd S. Nelson, Vice President/Strategy and Corporate Development 	Holding company.	Non-Rule II.B. affiliate

**SOUTHWEST GAS CORPORATION
ADVICE LETTER NO. 1071
ATTACHMENT C
SUMMARY OF AFFILIATES**

Name	Headquarters Business Address	Primary Officers	Business Activity	Affiliate Transaction Rules Status
Southwest Gas Transmission Co. (SWGTC)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	Not Applicable	FERC jurisdictional interstate natural gas pipeline transporting gas to Southwest Gas' southern Nevada system. SWGTC does not provide service in California.	Exempt per D.99-02-086
Southwest Gas Utility Group, Inc.	5241 Spring Mountain Road Las Vegas, NV 89150-0002	* John P. Hester, President/Chief Executive Officer * Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary	Holding company.	Non-Rule II.B. affiliate
The Southwest Companies (SC)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	* John P. Hester, Chairman of the Board/Chief Executive Officer * Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary	Holding company for temporary possession of certain real estate subsidiaries. Currently inactive.	Exempt per D.99-02-086
Utility Financial Corp. (UFCO)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	* John P. Hester, Chairman of the Board/Chief Executive Officer * Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary	Minority limited partner in SWGTC.	Exempt per D.99-02-086

List of Directors:

The Directors for Paiute, Carson Water, SC and UFCO are: 1)* Gregory J. Peterson, 2)* Karen S. Haller, and 3)* John P. Hester.
The Directors for Southwest Gas Holdings, Inc. are: 1) Robert L. Boughner, 2) Jose A. Cardenas, 3) Thomas E. Chestnut, 4) Stephen C. Comer, 5) LeRoy Hanneman, Jr., 6) *John P. Hester, 7) Anne L. Mariucci, 8) Michael J. Melarkey, 9) A. Randall Thoman, 10) Thomas A. Thomas, and 11) Terrance L. Wright.
The Directors for Southwest Gas Utility Group, Inc., are: 1)* Gregory J. Peterson, 2)* Karen S. Haller, 3)* John P. Hester, and 4) A. Randall Thoman.
The Directors for Centuri Construction Group, Inc., are: 1) * John P. Hester; 2) Paul M. Daily; and 3) Kevin L. Neill.

The Directors of NPL are: 1) Paul M. Daily, 2) Mark S. Wambach, and 3) Kevin L. Neill.
The Directors of Southwest Administrators are: 1) Lori L. Colvin, 2) Edward B. Giesecking, and 3) Catherine M. Mazzeo.
The Directors of IntelliChoice Energy are: 1) Ricardo B. Pringle, 2) Kevin L. Neill, and 3) Tommis E. Young.
The Directors of IntelliChoice Energy of California are: 1) Lori L. Colvin, 2) Edward B. Giesecking, and 3) Jason S. Wilcock.

* indicates a shared officer or director.

**Advice Letter No. 1071
Attachment C**

SOUTHWEST GAS CORPORATION
(U 905 G)
Summary of Affiliates

REDLINED

**SOUTHWEST GAS CORPORATION
ADVICE LETTER NO. 1071
ATTACHMENT C
SUMMARY OF AFFILIATES**

Name	Headquarters Business Address	Primary Officers	Business Activity	Affiliate Transaction Rules Status
Carson Water Company (Carson Water)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	<ul style="list-style-type: none"> * John P. Hester, Chairman of the Board/Chief Executive Officer * Roy R. Centrella Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/Chief Counsel/Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary 	Holding company	Exempt per D.99-02-086
Centuri Construction Group, Inc. (formerly Isleworth Holding Company)	2355 West Utopia Road Phoenix, AZ 85027-4167	<ul style="list-style-type: none"> * John P. Hester, Chairman of the Board * Paul M. Daily, President/Chief Executive Officer * Rock L. McHenry, Executive Vice President/Chief Customer Officer * Kevin L. Neill, Vice President/Chief Financial Officer/Treasurer * Ricardo B. Pringle, Executive Vice President/Chief Counsel/Corporate Secretary * Michael M. Cicchella, Jr., Executive Vice President/Chief Administrative Officer * Jill L. Blair, Assistant Corporate Secretary * Cheryl A. Wurst, Assistant Corporate Secretary 	Holding company	Rule II.B affiliate
IntelliChoice Energy LLC (IntelliChoice)	2355 West Utopia Road Phoenix, AZ 85027-4167	<p>John Cole, Chief Executive Officer Tommis Young, Chief Technology Officer</p>	Joint venture. Majority-owned subsidiary of NPL. Formed to market and commercialize natural gas-fired heat pump technology.	Limited exemption per D.10-09-005
IntelliChoice Energy of California LLC	2355 West Utopia Road Phoenix, AZ 85027-4167	Not Applicable	Wholly-owned subsidiary of IntelliChoice, formed to market/commercialize natural gas-fired pump heat technology in California	Rule II.B affiliate
NPL Construction Co. (NPL)	2355 West Utopia Road Phoenix, AZ 85027-4167	<p>Paul M. Daily, Chief Executive Officer Mark S. Wambach, President Kevin L. Neill, Treasurer Ricardo B. Pringle, Corporate Secretary Donald W. Harris, Assistant Corporate Secretary - Illinois Operations Jill L. Blair, Assistant Corporate Secretary</p> <ul style="list-style-type: none"> * Cheryl A. Wurst, Assistant Corporate Secretary 	Full service pipeline distribution system contractor.	Exempt per D.99-11-016
Paiute Pipeline Company (Paiute)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	<ul style="list-style-type: none"> * John P. Hester, Chairman of the Board/Chief Executive Officer * Roy R. Centrella Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Justin Lee Brown, Vice President/Regulation and Public Affairs * Kenneth J. Kenny, Vice President/Finance/Treasurer * Mark Litwin, Vice President/General Manager * Cheryl A. Wurst, Assistant Corporate Secretary 	FERC jurisdictional interstate natural gas pipeline. Paiute's system extends from the Idaho-Nevada border to the Nevada-California border.	Exempt per D.99-02-086
Southwest Administrators, Inc. (SA)	2355 West Utopia Road Phoenix, AZ 85027-4167	<p>Mark S. Wambach, President James W. Connell, Jr., Vice President Duane T. Stott, Vice President Ricardo B. Pringle, Secretary Kevin L. Neill, Treasurer Jill L. Blair, Assistant Corporate Secretary A. Dawn Herman, Assistant Corporate Secretary</p>	Wholly owned subsidiary of NPL. Formed to provide pipeline construction service in California.	Rule II.B affiliate. Limited exemption per D.99-11-016 for transactions outside of California
Southwest Gas Holdings, Inc.	5241 Spring Mountain Road	<p>Michael J. Melarkey, Chairman of the Board</p> <ul style="list-style-type: none"> * John P. Hester, President/Chief Executive Officer * Roy R. Centrella Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Gregory J. Peterson Lori L. Colvin, Vice President/Controller/Chief Accounting Officer * Boyd S. Nelson, Vice President/Strategy and Corporate Development 	Holding company.	Non-Rule II.B. affiliate

**SOUTHWEST GAS CORPORATION
ADVICE LETTER NO. 1071
ATTACHMENT C
SUMMARY OF AFFILIATES**

Name	Headquarters Business Address	Primary Officers	Business Activity	Affiliate Transaction Rules Status
Southwest Gas Transmission Co. (SWGTC)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	Not Applicable	FERC jurisdictional interstate natural gas pipeline transporting gas to Southwest Gas' southern Nevada system. SWGTC does not provide service in California.	Exempt per D.99-02-086
Southwest Gas Utility Group, Inc.	5241 Spring Mountain Road Las Vegas, NV 89150-0002	* John P. Hester, President/Chief Executive Officer * Roy R. Centrella Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary	Holding company.	Non-Rule II.B. affiliate
The Southwest Companies (SC)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	* John P. Hester, Chairman of the Board/Chief Executive Officer * Roy R. Centrella Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary	Holding company for temporary possession of certain real estate subsidiaries. Currently inactive.	Exempt per D.99-02-086
Utility Financial Corp. (UFCO)	5241 Spring Mountain Road Las Vegas, NV 89150-0002	* John P. Hester, Chairman of the Board/Chief Executive Officer * Roy R. Centrella Gregory J. Peterson, Senior Vice President/Chief Financial Officer * Karen S. Haller, Senior Vice President/General Counsel and Corporate Secretary * Kenneth J. Kenny, Vice President/Finance/Treasurer * Cheryl A. Wurst, Assistant Corporate Secretary	Minority limited partner in SWGTC.	Exempt per D.99-02-086

List of Directors:

The Directors for Paiute, Carson Water, SC and UFCO are: 1)* ~~Roy R. Centrella~~-Gregory J. Peterson, 2)* Karen S. Haller, and 3)* John P. Hester.
The Directors for Southwest Gas Holdings, Inc. are: 1) Robert L. Boughner, 2) Jose A. Cardenas, 3) Thomas E. Chestnut, 4) Stephen C. Comer, 5) LeRoy Hanneman, Jr., 6) *John P. Hester, 7) Anne L. Mariucci, 8) Michael J. Melarkey, 9) A. Randall Thoman, 10) Thomas A. Thomas, and 11) Terrance L. Wright.
The Directors for Southwest Gas Utility Group, Inc., are: 1)* ~~Roy R. Centrella~~ Gregory J. Peterson, 2)* Karen S. Haller, 3)* John P. Hester, and 4) A. Randall Thoman.
The Directors for Centuri Construction Group, Inc., are: 1) * John P. Hester; 2) Paul M. Daily; and 3) Kevin L. Neill.

The Directors of NPL are: 1) Paul M. Daily, 2) Mark S. Wambach, and 3) Kevin L. Neill.
The Directors of Southwest Administrators are: 1) Lori L. Colvin, 2) Edward B. Giesecking, and 3) Catherine M. Mazzeo.
The Directors of IntelliChoice Energy are: 1) Ricardo B. Pringle, 2) Kevin L. Neill, and 3) Tommis E. Young.
The Directors of IntelliChoice Energy of California are: 1) Lori L. Colvin, 2) Edward B. Giesecking, and 3) Jason S. Wilcock.

* indicates a shared officer or director.

Advice Letter No. 1071
Attachment D

Official Service List in
R.97-04-011/I.97-04-012

***** SERVICE LIST *****

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R9704011 LIST

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***** PARTIES *****

Ron Knecht
ADVOCATES FOR THE PUBLIC INTEREST (API)
1009 SPENCER ST
CARSON CITY NV 89703-5422
(650) 968-0115
ronknecht@aol.com
For: Consumers for the Public Interest

Patrick Mcdonnell
AGLAND ENERGY SERVICES, INC.
2000 NICASIO VALLEY RD.
NICASIO CA 94946
(415) 662-6944
pcmcdonnell@earthlink.net

Evelyn Kahl
ALCANTAR & KAHL, LLP
345 CALIFORNIA ST., STE. 2450
SAN FRANCISCO CA 94104
(415) 403-5542
ek@a-klaw.com
For: Texaco, Inc, Amoco Production Co. & Amoco Energy Trading Corp.

Michael Alcantar
Attorney At Law
ALCANTAR & KAHL, LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND OR 97201
(503) 402-9900
mpa@a-klaw.com
For: Cogeneration Association of California

Catherine E. Yap
BARKOVICH AND YAP
PO BOX 11031
OAKLAND CA 94611
(510) 450-1270
cathy@barkovichandyap.com

Ronald V. Stassi
Public Service Department
CITY OF BURBANK
164 WEST MAGNOLIA BOULEVARD
BURBANK CA 91502
(818) 238-3651

Bernard Palk
Public Service Department
CITY OF GLENDALE
141 NORTH GLENDALE AVENUE 4TH LEVEL
GLENDALE CA 91206
(818) 548-2107
slins@ci.glendale.ca.us

Rufus Hightower
Department Of Water & Power
CITY OF PASADENA
150 SOUTH LOS ROBLES ST., SUITE 200
PASADENA CA 91101
(626) 744-4425

Casey Gwinn
City Attorney
CITY OF SAN DIEGO
1200 3RD AVE., STE 1620
SAN DIEGO CA 92101
(619) 236-6220
casey@cityatty.sannet.gov

Frederick M. Ortlieb
Deputy City Attorney
CITY OF SAN DIEGO
1200 THIRD AVENUE, SUITE 1100
SAN DIEGO CA 92101-4100
(619) 236-6318
FOrtlieb@SanDiego.gov

Ray Czahar
5650 GRAVENSTEIN HIGHWAY-RTE 116 NORTH
FORESTVILLE CA 95436
(707) 887-2522
rczahar@aol.com

Patrick Ferguson
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO CA 94111-6533
(415) 276-6500
PatrickFerguson@dwt.com
For: Nutrosweet Kelco Company

Ann L. Trowbridge
Attorney
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO CA 95864
(916) 246-7303
ATrowbridge@DayCarterMurphy.com
For: California Industrial Users; Western Hub Properties

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I9704012

John W. Leslie, Esq.
DENTONS US LLP
EMAIL ONLY
EMAIL ONLY CA 00000
(619) 699-2536
John.Leslie@dentons.com

Daniel W. Douglass
Attorney
DOUGLASS & LIDDELL
4766 PARK GRANADA, SUITE 209
CALABASAS CA 91302
(818) 961-3001
Douglass@EnergyAttorney.com
For: Fair Energy Competition and Trading

James M. Day Jr.
DAN L. CARROLL
DOWNEY BRAND SEYMOUR & ROHWER LLP
555 CAPITOL MALL 10TH FLOOR
SACRAMENTO CA 95814-4686
(916) 441-0131

Crystal Needham
Senior Director, Counsel
EDISON MISSION ENERGY
3 MACARTHUR PLACE, STE. 100
SANTA ANA CA 92707
(949) 798-7977
cneedham@edisonmission.com

Lynn Haug
Attorney At Law
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO CA 95816-5905
(916) 447-2166
lmh@eslawfirm.com
For: Independent Energy Producers Ass/DEPT OF GENERAL SVCS.

Norman J. Furuta
Attorney
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO CA 94103-1399
(415) 503-6994
norman.furuta@navy.mil
For: Dept. of Defense

James W. Mc Tarnaghan
Attorney At Law
GOODIN MACBRIDE SQUERI DAY & LAMPREYLLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 765-8409
jmct@gmsr.com
For: Enron Capital & Trade Resources

Michael B. Day
Attorney
GOODIN, MACBRIDE, SQUERI, & DAY, LLP
505 SANSOME STREET, STE 900
SAN FRANCISCO CA 94111-3133
(415) 392-7900
MDay@GoodinMacbride.com
For: Wild Goose Storage, Inc.

Steven Lehtonen
GREEN PLUMBERS USA
4153 NORTHGATE BLVD., STE. 1
SACRAMENTO CA 95834-1218
(916) 239-4577
steve@greenplumbersusa.com
For: CA Assn of Plumbing/Heating/Cooling Contractors

Norman A. Pedersen
Attorney At Law
HANNA AND MORTON, LLP
444 SOUTH FLOWER STREET, SUITE 1500
LOS ANGELES CA 90071
(213) 430-2510
npedersen@hanmor.com
For: Southern California Utility Power Pool

James F. Mordah
Power Department
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL CA 92251
(619) 339-9144

Dan Bergmann
INTERSTATE GAS SERVICES, INC.
1700 N BROADWAY STE. 430
WALNUT CREEK CA 94596-4028
(925) 946-9090
dbergmann@igservice.com

***** SERVICE LIST *****

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I9704012

William B. Marcus
JBS ENERGY, INC.
311 D STREET, SUITE A
WEST SACRAMENTO CA 95608
(916) 372-0534
bill@jbsenergy.com

Andy Wuelliner
KIRKWOOD GAS AND ELECTRIC COMPANY
PO BOX 1
KIRKWOOD CA 95646

Hugh Larkin
LARKIN & ASSOCIATES, INC.
15728 FARMINGTON ROAD
LIVONIA MI 48154
(313) 522-3420

Sara Steck Myers
Attorney At Law
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO CA 94121
(415) 387-1904
ssmyers@att.net

William H. Booth
Attorney At Law
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA CA 94596
(925) 296-2460
wbooth@booth-law.com
For: California Large Energy Consumers Association (CLECA)

Elias G. Farrah
BRUCE W. NEELY
LE BOEUF LAMB GREENE & MACRAE, LLP
1875 CONNECTICUT AVE., N.W. SUITE 1200
WASHINGTON DC 20009

Scott Logan
Office of Ratepayer Advocates
RM. 4108
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1418
sjl@cpuc.ca.gov

MIRANT CANADA ENERGY MARKETING LTD.
300, 440 SECOND AVE., SW
CALGARY AB T2P 5E9
CANADA

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY CA 00000
(510) 834-1999
MRW@MRWassoc.com
For: City of San Diego

Kay Davoodi
Acq-Utility Rates And Studies Office
NAVAL FACILITIES ENGINEERING COMMAND HQ
1322 PATTERSON AVE., SE - BLDG 33
WASHINGTON DC 20374-5018
(202) 685-3319
khojasteh.davoodi@navy.mil

Richard Sperberg
President
ONSITE ENERGY CORPORATION
2701 LOKER AVE W 107
CARLSBAD CA 92008-6637
(760) 931-2400
rsperberg@onsitenergy.com

Matthew Wright
V. P. Regulation
PACIFICORP
825 NE MULTNOMAH, SUITE 800
PORTLAND OR 97232
(503) 813-6015
matthew.wright@Pacifcorp.com

Charles Doering
Principal Executive Consultant
RESOURCE MANAGEMENT INTERNATIONAL, INC.
225 W. BROADWAY, SUITE 4004
GLENDALE CA 91204
(818) 244-0117
charles_doering@rmiinc.com
For: Pan Alberta Limited

Michael Rochman
Managing Dir.
SCHOOL PROJECT UTILITY RATE REDUCTION
1850 GATEWAY BLVD., STE. 235
CONCORD CA 94520
(925) 743-1292
service@spurr.org
For: SPURR & REGIONAL ENERGY MANAGEMENT
COALITION

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I9704012

Bruce J. Williams
SEMPRA ENERGY
101 ASH STREET
SAN DIEGO CA 92101
(619) 696-4488
BWilliams@SempraUtilities.com
For: SEMPRA ENERGY

Elena Mello
SIERRA PACIFIC POWER COMPANY
6100 NEIL RD.
RENO NV 89511
(775) 834-5696
emello@sppc.com

June M. Skillman
Consultant
2010 GREENLEAF STREET
SANTA ANA CA 92706
(909) 280-9411
jskillman@prodigy.net

David E. Van Iderstine
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 345
ROSEMEAD CA 91770
(626) 302-3121
david.vaniderstine@sce.com

Thomas K. Braun
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-4413
thomas.braun@sce.com

Joe F. Young
SOUTHERN CALIFORNIA WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS CA 91773
(714) 394-3677

Catherine Mazzeo
Assistant General Counsel
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89150-0002
(702) 876-7250
catherine.mazzeo@swgas.com
For: Southwest Gas Corporation

Seth D. Hilton
Attorney At Law
STOEL RIVES LLP
THREE EMBARCADERO CENTER, STE. 1120
SAN FRANCISCO CA 94111
(415) 617-8913
sdhilton@stoel.com

John R. Staffier
STUNTZ & DAVIS
555 ELEVENTH ST., N.W. SUITE 550
WASHINGTON DC 20004
(202) 662-6780
jstaffier@sdsatty.com
For: PAN ALBERTA GAS LTD

Keith Mccrea
Attorney At Law
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON DC 20004-2415
(202) 383-0705
keith.mccrea@sablaw.com

Bob Finklestein
THE UTILITY REFORM NETWORK
785 MARKET ST., STE. 1400
SAN FRANCISCO CA 94103
(415) 929-8876
bfinklestein@turn.org

Marcel Hawiger
THE UTILITY REFORM NETWORK
785 MARKET ST., STE. 1400
SAN FRANCISCO CA 94103
(415) 929-8876
marcel@turn.org
For: The Utility Reform Network (TURN)

***** STATE EMPLOYEE *****

Faline Fua
Communications Division
AREA 3-D
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-1989
fua@cpuc.ca.gov

***** SERVICE LIST *****

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R9704011 LIST

I9704012

John Rozsa
SENATE ENERGY UTILITIES & COMMUNICATIONS
STATE CAPITOL
SACRAMENTO CA 95814

***** INFORMATION ONLY *****

Marc D. Joseph
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO CA 94080
(650) 589-1660
MDJoseph@AdamsBroadwell.com

Edward G. Poole
Attorney
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO CA 94108-2818
(415) 956-6413 X-102
epoole@adplaw.com

Cathy Keuther
Ann Constable
BOSTON EDISON CORPORATION
800 BOYLESTON STREET
BOSTON MA 02199

Stephen B. Bowen
BOWEN LAW GROUP
5811 SCARBOROUGH DR., STE. 201
OAKLAND CA 94611-2721
(415) 394-7500
steve.bowen@bowenlawgroup.com

Scott Blaising
BRAUN BLAISING MCLAUGHLIN P.C.
EMAIL ONLY
EMAIL ONLY CA 00000
(916) 682-9702
blaising@braunlegal.com

Terry McBride
BURNS & MCBRIDE
105 S. MARKET STREET
WILMINGTON DE 19801

Jason Mihos
Regulatory Correspondent
CALIFORNIA ENERGY MARKETS
517B POTRERO AVE
SAN FRANCISCO CA 94110-1431
(415) 824-3222
jasonm@newsdata.com

Linda J. Dondanville
Consultant
5342 WINDING VIEW TRAIL
SANTA ROSA CA 95404
(707) 528-8151

Donald C. Liddell
DOUGLASS & LIDDELL
EMAIL ONLY
EMAIL ONLY CA 00000
(619) 993-9096
liddell@energyattorney.com

Jeffery D. Harris
Attorney At Law
ELLISON, SCHNEIDER & HARRIS
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO CA 95816-5905
(916) 447-2166
jdh@eslawfirm.com

Albert K. Davies
Director Of Project Development
ENRON WIND DEVELOPMENT CORP.
1710 HAPPY VALLEY ROAD
SANTA ROSA CA 95409

Gregory T. Blue
ENXCO DEVELOPMENT CORP
5000 EXECUTIVE PARKWAY
SAN RAMON CA 94583
(925) 242-0168 X20
gblue@enxco.com

Todd S. Glassey
EMAIL ONLY
EMAIL ONLY CA 00000
tglassey@certichron.com

David Jarrat
PO BOX 7880
SAN FRANCISCO CA 94120

Brenda Jordan
9 ROSCOE STREET
SAN FRANCISCO CA 94110-5921
(415) 824-3222

Kayode Kajopaiye
Executive Division
RM. 3105
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2279
kok@cpuc.ca.gov

***** SERVICE LIST *****

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I9704012

Richard Hamilton
Attorney At Law
LAW OFFICES OF RICHARD L. HAMILTON
7 PARKCENTER DR.
SACRAMENTO CA 95825-5407
(916) 484-7646
hylaw@pacbell.net

Fay A. Chu
Deputy City Attorney
LOS ANGELES CITY ATTORNEY'S OFFICE
111 NORTH HOPE JFB 340
LOS ANGELES CA 90012
(213) 367-4580
fchu@legal.ladwp.com

Alvin Chan
LOS ANGELES DEPT. OF WATER & POWER
PO BOX 5 1111, SUITE 340
LOS ANGELES CA 90051-0100
(213) 367-4500

Scott Tomashefsky
NORTHERN CALIFORNIA POWER AGENCY
651 COMMERCE DRIVE
ROSEVILLE CA 95678-6420
(916) 781-4291
scott.tomashefsky@ncpa.com

Ann H. Kim
PACIFIC GAS AND ELECTRIC COMPANY
LAW DEPT
77 BEALE STREET, RM 3105 / PO BOX 7442
SAN FRANCISCO CA 94120
(415) 973-7467
AHK4@pge.com

Michael Chinen
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE, B28K
SAN FRANCISCO CA 94105-1814
mtcc@pge.com

Regulatory File Room
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO CA 94120
(415) 973-4295
CPUCCases@pge.com

Stacy W. Walter
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B30A
SAN FRANCISCO CA 94105
(415) 973-6611
sww9@pge.com
For: PACIFIC GAS AND ELECTRIC COMPANY

Cathie Allen
Regulatory Mgr.
PACIFICORP
EMAIL ONLY
EMAIL ONLY OR 00000
(503) 813-5934
CaliforniaDockets@pacificorp.com

Connie Silveria
SIERRA PACIFIC POWER COMPANY
LEGAL DEPARTMENT
6100 NIEL RD.
RENO NV 89520

Case Administration
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
(626) 302-3101
case.admin@sce.com

Hugh Yao
SOUTHERN CALIFORNIA GAS COMPANY
EMAIL ONLY
EMAIL ONLY CA 00000
(213) 244-3619
HYao@SempraUtilities.com
For: SOUTHERN CALIFORNIA GAS COMPANY

Valerie Ontiveroz
Regulatory Mgr / California
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD, LVB-105
LAS VEGAS NV 89150-0002
(720) 876-7323
valerie.ontiveroz@swgas.com

Les Saffil
SSP NORTHRIDGE GAS SHUT-OFF VALVE CO.
5520 SHENANDOAH AVENUE
LOS ANGELES CA 90056
(310) 645-6877
lsaffil@flash.net

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R9704011 LIST
I9704012

Helen W. Yee
Legal Division
RM. 5034
505 Van Ness Avenue
San Francisco CA 94102 3298
(415) 703-2474
yee@cpuc.ca.gov