505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

October 29, 2018

PUBLIC UTILITIES COMMISSION

Advice Letter 1081-G

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

SUBJECT: To Request a One-Year Extension of the Conditional Approval Granted to SWG for its Revisions to Preliminary Statement 17 - Gas Cost Incentive Mechanism.

Dear Mr. Brown:

Advice Letter 1081-G is effective as of October 31, 2018.

Sincerely,

Edward Randoph

Edward Randolph Director, Energy Division



October 5, 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. 1081

Enclosed herewith is an original and one (1) copy of Southwest Gas Corporation's Advice Letter No. 1081. There are no tariff sheets associated with this submission.

Sincerely,

us of Valerie J. Ontiveroz Regulatory Manager/California

VJO:jjp Enclosures



October 5, 2018

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Southwest Gas Corporation (Southwest Gas or Company) herewith submits Advice Letter No. 1081. There are no tariff sheets associated with this submission.

<u>Purpose</u>

The purpose of this Advice Letter is to request a one year extension of the conditional approval granted to Southwest Gas for its revisions to Preliminary Statement 17 – Gas Cost Incentive Mechanism (GCIM).

Background

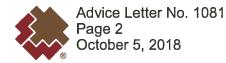
On March 23, 2016, Southwest Gas filed Advice Letter No. 1006, requesting approval to modify its Preliminary Statement 17 concerning its GCIM. Specifically, the GCIM modifications allow for the appropriate evaluation of Southwest Gas' natural gas purchases (i.e., daily purchases v. daily indices, monthly purchases v. monthly indices) and provide for the flexibility to address and account for events that influence the Company's natural gas procurement that are outside Company' control. On October 28, 2016, the Energy Division approved Southwest Gas' GCIM modifications for the GCIM reporting period November 1, 2016 through October 31, 2017. Pursuant to the Energy Division, "If [Southwest Gas] chooses to extend the modifications beyond October 31, 2017, [Southwest Gas] must request an extension for these modifications either through another [A]dvice [L]etter filing or include it in another [Commission] proceeding, such as its upcoming GRC filing scheduled for September 2017."

The Company's need to modify its GCIM was driven by: 1) Southern California Gas Company's (SoCalGas) implementation of tariff changes permitting high and low Operational Flow Orders (OFOs) and Emergency Flow Orders (EFOs); 2) the concerns about the availability of SoCalGas' Aliso Canyon underground storage facility; and 3) SoCalGas' implementation of daily balancing on its system. These events impact Southwest Gas' natural gas procurement practices, resulting in the potential need for Southwest Gas to make daily natural gas purchases in the Company's Southern California service territory. The conditions surrounding the Company's request to modify its GCIM remain.

Therefore, Southwest Gas requests a one-year extension of its approved GCIM tariff modifications for the upcoming GCIM reporting period November 1, 2018 through October 31, 2019.

Southwest Gas does not propose any additional modifications to its tariff beyond those already approved by the Energy Division in Advice Letter No. 1006.

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 2, effective after Energy Division approval pursuant to General Order (GO) 96-B. Southwest Gas respectfully requests that this Advice Letter be made effective on October 31, 2018, consistent with the start of Company's next GCIM reporting period.

Protest

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

Attention: Tariff Unit Energy Division California Public Utilities Commission 505 Van Ness Avenue, 4th Floor San Francisco, California 94102 Email: <u>edtariffunit@cpuc.ca.gov</u> Facsimile: (415) 703-2200

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

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

Notice

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

<u>Service</u>

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



Advice Letter No. 1081 Page 3 October 5, 2018

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 Email: <u>valerie.ontiveroz@swgas.com</u>

Respectfully submitted, SOUTHWEST GAS CORPORATION By Justin Lee Brown Attachments

DISTRIBUTION LIST

Advice Letter No. 1081

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 ROrtiz@SempraUtilities.com

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

Belinda Gatti Energy Division California Public Utilities Commission belinda.gatti@cpuc.ca.gov

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

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

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

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MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)						
Company name/CPUC Utility No.: Southwest Gas Corporation (U 905 G)						
Utility type: ELC GAS WATER PLC HEAT	Contact Person: Valerie J. Ontiveroz Phone #: 702 876-7323 E-mail: valerie.ontiveroz@swgas.com E-mail Disposition Notice to: valerie.ontiveroz@swgas.com					
EXPLANATION OF UTILITY TYPE ELC = Electric GAS = Gas WATER = Water PLC = Pipeline HEAT = Heat WATER = Water	(Date Submitted / Received Stamp by CPUC)					
Advice Letter (AL) #: 1081	Tier Designation: Tier 2					
Subject of AL: To request a one-year extension of the conditional approval granted to SWG for its revisions to Preliminary Statement 17 - Gas Cost Incentive Mechanism.						
Keywords (choose from CPUC listing): Preliminary Statement AL Type: Monthly Quarterly Annual One-Time Other: If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:						
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: Not applicable						
Summarize differences between the AL and the prior withdrawn or rejected AL: Not Applicable						
Confidential treatment requested? Yes 🗸 No						
If yes, specification of confidential information: Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:						
Resolution required? 🗌 Yes 🖌 No						
Requested effective date: 10/31/18	No. of tariff sheets: 0					
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 proposed ^{1:} 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 submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102 Email: <u>EDTariffUnit@cpuc.ca.gov</u>	Name: Mr. Justin Lee Brown Title: Senior Vice-President/General Counsel Utility Name: Southwest Gas Corporation Address: P. O. Box 98510 City: Las Vegas State: Nevada Telephone (xxx) xxx-xxxx: 702-876-7183 Facsimile (xxx) xxx-xxxx: 702-364-3452 Email: justin.brown@swgas.com		
	Name: Title: Utility Name: Address: City: State: _{Nevada} Telephone (xxx) xxx-xxxx: Facsimile (xxx) xxx-xxxx: Email:		