STATE OF CALIFORNIA GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



June 3, 2019

Advice Letter 1100-G

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

SUBJECT: Modification of Rule No. 23 in Accordance with Resolution E-4958

Dear Mr. Brown:

Advice Letter 1100-G is effective as of April 30, 2019.

Sincerely,

Edward Randolph

Deputy Executive Director for Energy and Climate Policy/

Director, Energy Division

Edward Ramlofate



April 30, 2019

Advice 1100-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Modification of Rule No. 23 in Accordance with Resolution E-4958

Southwest Gas Corporation (Southwest Gas or Company) hereby submits for approval by the California Public Utilities Commission (Commission) revisions to its California Gas Tariff. The tariff sheets being modified as a result of this submission are listed in Attachment A.

Background

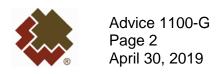
Decision (D.) 14-03-021, issued in 2014, established the Mobile Home Park Utility Upgrade Program (MHP Program). The MHP Program is a voluntary, statewide, three-year pilot program implemented with a goal to convert 10 percent of each natural gas and electric utility's total mobilehome park and manufactured housing community (collectively, MHPs) spaces to direct utility service. D.14-03-021 authorized the MHP Program to run from January 1, 2015 through December 31, 2017. Resolution E-4878, issued on September 29, 2017, approved Southwest Gas' Advice Letter No. 1035 at the conversion rate requested therein. Additionally, Resolution E-4878 ordered that the various utilities:

...continue the [MHP Program] and complete all Category 1 MHP conversions as established in Decision 14-03-021 (approximately 10% of the MHP spaces) and work on Category 2 and 3 MHPs until the earlier date of December 31, 2019 or the issuance of a Commission Decision for the continuation, expansion or modification of the program. The number of spaces converted in years 2018 and 2019 cannot exceed the levels specified in the utility's respective advice letter filing. However, a utility shall not begin construction of a utility upgrade project of a MHP if, at the start of the construction project, facts indicate that this conversion project would not be completed by October 31, 2019.²

On March 18, 2019, the Commission issued Resolution E-4958 authorizing all participating utilities to continue the MHP Program until the earlier date of either December 31, 2021, or the issuance of a Commission Decision for the continuation, expansion or

¹ Resolution E-4878, Ordering Paragraph (OP) 6, at pg.22.

² Id., at pg. 6 and OP 7 at pg. 22.



modification of the program beyond December 31, 2020 in Rulemaking 18-04-018³, subject to the following limitations:

Eligible MHPs are those which the utilities and/or MHP owners have incurred financial obligations on or before November 1, 2018, defined as:

- 1. When the utility has begun its design/planning/construction of the To-the-Meter (TTM) work, OR
- 2. When an MHP owner has selected and made a commitment to a Beyond-the-Meter (BTM) contractor to do the BTM work.⁴

Additionally, pursuant to Resolution E-4958, the number of eligible spaces converted in 2020 and 2021 may not exceed 3.33% annually of the total master-metered spaces in a utility's service territory not already under conversion or scheduled for conversion beyond 2019. If a single MHP upgrade results in a utility exceeding the 3.33% maximum requirement, the utility is authorized to proceed with that upgrade.⁵

Therefore, Southwest Gas submits modifications to its Rule No. 23, Mobilehome Park Utility Upgrade Program to conform with Resolution E-4958.

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 the tariff sheets filed herein be made effective April 30, 2019, 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 submission 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

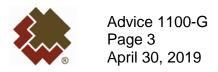
Email: edtariffunit@cpuc.ca.gov Facsimile: 415-703-2200

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³ Resolution E-4958, OP 1 at pg. 11.

⁴ Resolution E-4958, OP 2 at pg. 11.

⁵ ld.



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

Mr. Justin Lee Brown
Senior Vice President/General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510

Email: justin.brown@swgas.com

Facsimile: 702-364-3452

Notice

Pursuant to Energy Industry Rule 3.1(2), Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 in GO 96-B since this Advice Letter is submitted in accordance Resolution E-4958.

Service

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

Communications regarding this submission should be directed to:

Valerie J. Ontiveroz Regulatory Manager/California Southwest Gas Corporation P.O. Box 98510

Las Vegas, NV 89193-8510 Telephone: 702-876-7323

Email: valerie.ontiveroz@swgas.com

Respectfully submitted,

SOUTHWEST GAS CORPORATION

Attachments

Distribution List

Advice Letter No. 1100

In conformance with GO 96-B, General Rule 4.3

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

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

Pacific Gas & Electric Company PGETariffs@pge.com

Southern California Gas Company ROrtiz@SempraUtilities.com

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

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

Robert M. Pocta
Public Advocates Office
California Public Utilities Commission
robert.pocta@cpuc.ca.gov

Nathaniel Skinner
Public Advocates Office
California Public Utilities Commission
nathaniel.skinner@cpuc.ca.gov

Pearlie Sabino
Public Advocates Office
California Public Utilities Commission
pearlie.sabino@cpuc.ca.gov

ATTACHMENT A Advice Letter No. 1100

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
3rd Revised Sheet No. 279.15	Rule No. 23 – Mobilehome Park Utility Upgrade Program	2nd Revised Sheet No. 279.15
2nd Revised Sheet No. 279.16	Rule No. 23 – Mobilehome Park Utility Upgrade Program (Continued)	1st Revised Sheet No. 279.16

3rd Revised
2nd RevisedCal. P.U.C. Sheet No.279.152nd RevisedCal. P.U.C. Sheet No.279.15 2nd Revised Canceling

RULE NO. 23

MOBILEHOME PARK UTILITY UPGRADE PROGRAM

PURPOSE

This Rule sets forth the general terms and conditions applicable to the Mobilehome Park Utility Upgrade Program (MHP Program). The MHP Program is a voluntary program offered to eligible master-metered submetered Mobilehome Parks or Manufactured Housing Communities (collectively referred to as MHP) to convert their submetered spaces and common use services from master-metered submetered gas distribution to direct Company gas distribution service, subject to the requirements and limitations set forth in this Rule and the applicable MHP Program documents. Pursuant to Commission Decision 14-03-021, the MHP Program was authorized as a three-year pilot program through December 31, 2017. Commission Resolution E-4878 authorized the continuation of the MHP Program through December 31, 2019, subject to the criteria set forth therein. Resolution E-4958 subsequently authorized the continuation of the MHP Program, subject to the criteria set forth therein, until the earlier of December 31, 2021, or the issuance of a Commission Decision for the continuation, expansion or modification of the program in Rulemaking 18-04-018.

APPLICABILITY

The MHP Program is available to all eligible master-metered submetered MHPs within the Company's service territory as defined in the Preliminary Statement of this California Gas Tariff. Within the eligible MHPs, the only eligible MHP spaces are those permitted by the California Department of Housing and Community Development (HCD). Recreational vehicle parks and spaces are not eligible for the MHP Program.

DEFINITIONS Α.

Specific terms used in this Rule are defined below. Additional definitions are also found in Rule No. 1, Definitions of this California Gas Tariff.

Beyond the meter: "Beyond the meter" facilities include - the infrastructure and substructures necessary to extend facilities from the Service Delivery Point to the Mobilehome exterior line stub (i.e., the point of connection on the Mobilehome). The Company will not be responsible for any part of the point of connection material, including labor, or any work that would require an alteration permit. "Beyond the meter" facilities are the responsibility of the MHP Owner/Operator. The Mobilehome exterior line stub outlet will continue to be part of the Mobilehome and be the responsibility of the MHP Resident.

Date Filed April 30, 2019 Issued by Advice Letter No. 1100 April 30, 2019 Justin Lee Brown Effective Vice President E-4958 Decision No. Resolution No.

California Gas Tariff

Canceling

2nd Revised 1st Revised

Cal. P.U.C. Sheet No. 279.16 Cal. P.U.C. Sheet No. 279.16

RULE NO. 23

MOBILEHOME PARK UTILITY UPGRADE PROGRAM (Continued)

Α. **DEFINITIONS** (Continued)

Common Use Area:

All designated buildings, areas, or facilities within an MHP that are intended to be used by all MHP Residents and/or the MHP Owner/Operator. Energy costs for serving the common area are

paid by the MHP Owner/Operator.

Legacy System:

The existing MHP master-metered submetered system.

Manufactured Housing Community:

Any area or tract of land where two or more manufactured home lots are rented or leased, held out for rent or lease, or were formerly held out for rent or lease and later converted to subdivision, cooperative, condominium, or other form of resident ownership, only to accommodate the use of manufactured homes constructed pursuant to the National Manufactured

Housing Construction and Safety Standards Act of 1974.

Meter Shed:

A structure used to help protect the meter set assembly from potential damage due to the accumulation of snow and ice.

MHP Resident:

A person who has tenancy in an MHP under a rental agreement,

or who lawfully occupies a Mobilehome.

Mobilehome:

Refer to Rule No. 1, Definitions, of this California Gas Tariff.

Mobilehome Park (MHP): Refer to Rule No. 1, Definitions, of this California Gas Tariff.

Mobilehome

Space:

Designated area within an MHP that is owned, rented, or held out for rent, to accommodate a Mobilehome used for human

habitation.

MHP Owner/ Operator:

The party that has legal obligation for the MHP.

Service Delivery

Point:

The point where the Company's facilities (pipe, valves, meter set assemblies and associated equipment) are connected to the pipe (house line) owned by either the MHP Owner/Operator or the MHP Resident, normally adjacent to the location of the

meter.

1100 Advice Letter No. Decision No.

Issued by Justin Lee Brown Vice President

April 30, 2019 Date Filed April 30, 2019 Effective Resolution No. E-4958



California Public Utilities Commission

ADVICE LETTER SUMMARY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)			
Company name/CPUC Utility No.: Southwest Gas Corporation (U 905 G)			
Utility type: ☐ ELC	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	(Date Submitted / Received Stamp by CPUC)		
Advice Letter (AL) #: 1100	Tier Designation: Tier 1		
Subject of AL: Modification of Rule No. 23 in Accordance with Resolution E-4958			
Keywords (choose from CPUC listing): Form 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 V 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 V No			
Requested effective date: 4/30/19	No. of tariff sheets: 2		
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: EDTariffUnit@cpuc.ca.gov

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: