

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,

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

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division



# SOUTHWEST GAS CORPORATION

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.<sup>1</sup> 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.<sup>2</sup>

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

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

<sup>2</sup> Id., at pg. 6 and OP 7 at pg. 22.



modification of the program beyond December 31, 2020 in Rulemaking 18-04-018<sup>3</sup>, 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.<sup>4</sup>

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.<sup>5</sup>

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, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)  
Facsimile: 415-703-2200

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<sup>3</sup> Resolution E-4958, OP 1 at pg. 11.

<sup>4</sup> Resolution E-4958, OP 2 at pg. 11.

<sup>5</sup> Id.



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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](mailto: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](mailto:valerie.ontiveroz@swgas.com)

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By:   
Valerie J. Ontiveroz

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](mailto:elizabeth.echols@cpuc.ca.gov)

Pacific Gas & Electric Company  
[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

Southern California Gas Company  
[ROrtiz@SempraUtilities.com](mailto:ROrtiz@SempraUtilities.com)

San Diego Gas & Electric Company  
[SDG&ETariffs@SempraUtilities.com](mailto:SDG&ETariffs@SempraUtilities.com)

Belinda Gatti  
Energy Division  
California Public Utilities Commission  
[belinda.gatti@cpuc.ca.gov](mailto:belinda.gatti@cpuc.ca.gov)

Robert M. Pocta  
Public Advocates Office  
California Public Utilities Commission  
[robert.pocta@cpuc.ca.gov](mailto:robert.pocta@cpuc.ca.gov)

Nathaniel Skinner  
Public Advocates Office  
California Public Utilities Commission  
[nathaniel.skinner@cpuc.ca.gov](mailto:nathaniel.skinner@cpuc.ca.gov)

Pearlie Sabino  
Public Advocates Office  
California Public Utilities Commission  
[pearlie.sabino@cpuc.ca.gov](mailto:pearlie.sabino@cpuc.ca.gov)

ATTACHMENT A  
Advice Letter No. 1100

<u>Cal. P.U.C. Sheet No.</u>	<u>Title of Sheet</u>	<u>Canceling Cal. P.U.C. Sheet No.</u>
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

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.

A. DEFINITIONS

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.

RULE NO. 23

MOBILEHOME PARK UTILITY UPGRADE PROGRAM

(Continued)

A. 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.





# ADVICE LETTER 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:

- 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

(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  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: 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<sup>1</sup>: See 'Subject of AL' above

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

<sup>1</sup>Discuss in AL if more space is needed.

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](mailto: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](mailto:justin.brown@swgas.com)

Name:  
Title:  
Utility Name:  
Address:  
City: State: Nevada  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: