

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 29, 2019

**Advice Letter 1105-G &
Supplemental 1105-G-A**

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

SUBJECT: Modification of Rule No. 22 to Implement Procedures for Reduced Siloxane Testing Requirements, Pursuant to Decision (D.) 19-05-018

Dear Mr. Brown:

Advice Letter 1105-G and Supplemental 1105-G-A are effective as of July 17, 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

June 28, 2019

Advice 1105-A

(U 905 G)

Public Utilities Commission of the State of California

Subject: Supplement – Advice Letter 1105 Pursuant to Decision (D.) 19-05-018

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.

Purpose

The purpose of this submission is to supplement in part Advice Letter No. 1105, which was filed on June 17, 2019, to modify Rule No. 22 – Biomethane Gas, in accordance with Ordering Paragraph (OP) 3 in Decision (D.) 19-05-018. This submission replaces tariff Sheet Nos. 279.3 and 279.6 and Page 2 of the Advice Letter. The tariff sheets have been revised to include inadvertently omitted language, and correct ministerial typographical errors. Additionally, the Notice section of Page 2 has been revised to reference the appropriate exemption language.

The attached modified pages replace the corresponding original pages in Advice Letter No. 1105. All other aspects of the original Advice Letter remain unchanged.

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 July 17, 2019, which is the originally requested effective date for Advice Letter No. 1105.

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



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

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

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 since this Advice Letter is submitted in compliance with OP 3 in D.19-05-018 and will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule.

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

By: 
Valerie J. Ontiveroz

Attachments

Distribution List

Advice Letter No. 1105-A

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. 1105-A

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
3rd Revised Sheet No. 279.3	Rule No. 22 – Biomethane Gas (Continued)	1st and 2nd Revised Sheet No. 279.3
3rd Revised Sheet No. 279.6	Rule No. 22 – Biomethane Gas (Continued)	1st and 2nd Revised Sheet No. 279.6

RULE NO. 22

BIOMETHANE GAS

(Continued)

B. BIOMETHANE GAS SPECIFICATIONS (Continued)

6. Source-specific Biomethane Gas Testing shall vary based on the source of the Biomethane Gas: (Continued)

- d. Biomethane Gas suppliers that certify that their biogas is sourced only from dairy, animal manure, agricultural waste, forest residues, and/or commercial food processing waste, and products that contain siloxanes are not used at their facilities in any way that allows siloxanes to enter the biomethane, shall have reduced siloxanes testing requirements, as described in Section C.1.g of this Rule. If the certification identified by the Biomethane Gas supplier no longer applies, then the Biomethane Gas supplier must notify the Company and the full siloxanes testing requirements shall apply.

C. BIOMETHANE GAS TESTING

1. Pre-Injection Testing

- a. Prior to the injection of Biomethane Gas, the Biomethane Gas supplier shall conduct two tests over a two to four week period for the Constituents identified for that Biomethane Gas source in Section B.6 of this Rule.
- b. Testing will be performed by the Biomethane Gas supplier using independent certified third party laboratories. The Company shall be notified of the Biomethane Gas sampling and tests and have the option to observe the samples being taken. Test results will be shared with the Company within five (5) calendar days of the test results being received by the Biomethane Gas supplier.
- c. If during pre-injection testing Health Protective Constituents are found at or above the Trigger Level, the Biomethane Gas' collective cancer risk or non-cancer risk must be calculated. The collective cancer risk or non-cancer risk is the sum of all Health Protective Constituent concentrations above the Trigger Level, as specified in Section C.2.c.(i) of this Rule. If the collective cancer risk or non-cancer risk from Group 2 Compounds is at or above the Lower Action Level (the cancer risk Lower Action Level is ≥ 10 in a million and the non-cancer risk Lower Action Level is a hazard index of ≥ 1), the Biomethane Gas cannot be injected into the Company's pipeline system.

RULE NO. 22

BIOMETHANE GAS
(Continued)

C. BIOMETHANE GAS TESTING (Continued)

2. Periodic Testing (Continued)

c. Collective risk for Carcinogenic and Non-Carcinogenic Health Protective Constituents (Continued)

(iii) If annual periodic testing demonstrates that the collective cancer risk or non-cancer risk from Group 2 Compounds is at or above the Lower Action Level, then testing will revert to quarterly.

(iv) If the Biomethane Gas is not accepted into the Company's system in accordance with the requirements set forth in this Rule, testing for all Group 1 and Group 2 Compounds will be subject to the Biomethane Gas Restart Procedures set forth in Section C.4 of this Rule.

d. Pipeline Integrity Protective Constituent

(i) Constituents shall be tested once every 12 month period in which injection of Biomethane Gas occurs.

(ii) Any constituent with a concentration below the Trigger Level during two (2) consecutive annual periodic tests shall be tested once every two-year period in which injection of Biomethane Gas occurs.

(iii) If periodic testing demonstrates that any constituent is at or above the Trigger Level, that constituent will be tested quarterly.

(iv) When any constituent is found at or above levels equivalent to the Lower Action Level three times in a 12 month period, the Biomethane Gas shall be shut-in and subject to the Biomethane Gas Restart Procedures set forth in section C.4 of this Rule.



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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 the tariff sheets filed herein be made effective July 17, 2019, which is 30 days from the date submitted.

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

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

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 since this Advice Letter is submitted in compliance with OP 3 in D.19-05-018 and will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule.



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) #: 1105-A

Tier Designation: Tier 2

Subject of AL: Supplement - Modification of Rule No. 22 in Accordance with Decision 19-05-018

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 #: Decision 19-05-018

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: 7/17/19

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 proposed¹: See 'Subject of AL' above

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

¹Discuss 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

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: