

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 16, 2020

Advice Letter AL 1130, 1130-G-A, AL-1130-G-B, 1130-C

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

SUBJECT: Implementation of Emergency Disaster Relief Program in Southwest Gas Corporation's Service Territory in Response to the COVID-19 State of Emergency Declaration Pursuant to Decision 19-07-015 and March 17, 2020 Executive Director Letter.

Dear Mr. Brown:

Advice Letter AL 1130, 1130-G-A, AL-1130-G-B, 1130-CB is effective as of March 4, 2020.

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

October 13, 2020

ATTN: Tariff Unit, Energy Division
edtariffunit@cpuc.ca.gov
California Public Utilities Commission
505 Van Ness Avenue, Room 4005
San Francisco, CA 94102

Subject: Southwest Gas Corporation (U 905 G)
Advice Letter No. 1130-C – Substitute Sheet

Enclosed is an original and two (2) copies of Southwest Gas Corporation's (Southwest Gas) Attachment A and tariff sheet included in Advice Letter Nos. (AL) 1130-C. AL 1130-C, submitted on September 16, 2020, partially supplemented AL 1130-B, submitted on August 11, 2020. Both AL 1130-B and 1130-C were submitted in accordance with Resolution M-4842, which ratified the COVID-19 Pandemic Emergency Customer Protections issued by the Commission Executive Director on March 17, 2020.

The purpose of this transmittal is to update tariff Sheet No. 45.17 submitted in AL 1130-C. On August 28, 2020, AL 1142 was submitted to establish the Customer Data Modernization Initiative Balancing Account, wherein the same sheet number (45.17) was inadvertently used again. AL 1142 was subsequently approved on September 25, 2020, effective August 28, 2020.¹ Therefore, through this submission Southwest Gas is revising the tariff sheet number to the next in number sequence or Sheet No. 45.19. Attachment A has also been updated in conformance with these revisions.

Southwest Gas respectfully requests that the enclosed substitute tariff sheet and Attachment A replace the originally submitted tariff sheet and Attachment A in AL 1130-C.

In accordance with General Order 96-B, General Rule 7.5.1, Southwest Gas is serving copies of this substitute sheet filing to the utilities and interested parties shown on the attached list.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachment

¹ ALs 1130-B and C are pending approval as of this date.

Distribution List

Advice Letter No. 1130-G-C
SUBSTITUTE SHEET SUBMISSION

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

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

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

ATTACHMENT A
Advice Letter No. 1130-G-C

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original Sheet No. 45.19	Preliminary Statement – (continued)	

PRELIMINARY STATEMENT
(Continued)

35. COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA)

35A. PURPOSE

Pursuant to Resolution M-4842, dated April 16, 2020, the purpose of the CPPMA is to record incremental costs and waived charges incurred by the Company associated with its implementation of the COVID-19 customer protections as outlined in Advice Letter No. 1130-A, as clarified in Advice Letter No. 1130-G-B. The COVID-19 customer protections apply to all Residential and Small Business Customers (non-residential customers) with an annual consumption of less than 10,000 therms and as defined in Rule No. 1-Definitions of this California Gas Tariff. The CPPMA is effective March 4, 2020.

35B. APPLICABILITY

The CPPMA balance will be recovered from customers as authorized by the Commission.

35C. ACCOUNTING PROCEDURES

For costs associated with the implementation of the COVID-19 customer protections, the Company shall will make the following entries to the CPPMA at the end of each month, net of Franchise Fees and Uncollectibles (FF&U), where applicable:

- a. A debit entry equal to the actual operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return);
- b. A debit entry equal to waived charges;
- c. A debit entry for incremental uncollectible expenses;
- d. A debit entry for other incremental costs; and
- e. An entry to record interest on the CPPMA balance calculated as set forth in Section 12B of this Preliminary Statement.

Costs recorded in the CPPMA will be tracked by customer class.

35D. DISPOSITION

Costs recorded in the CPPMA may be recovered in rates only after a request by the Company and approval by the Commission either through a general rate case or other applicable proceeding.

N
N



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

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:

Summarize differences between the AL and the prior withdrawn or rejected AL:

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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

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

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



SOUTHWEST GAS CORPORATION

September 16, 2020

Advice Letter No. 1130-G-C

(U 905 G)

Public Utilities Commission of the State of California

Subject: Implementation of Emergency Disaster Relief Program in Southwest Gas Corporation's Service Territory in Response to the COVID-19 State of Emergency Declaration Pursuant to Decision 19-07-015 and Resolution M-4842

Southwest Gas Corporation (Southwest Gas or Company) hereby submits for approval to the California Public Utilities Commission (Commission) revisions to its California Gas Tariff. The tariff sheet being modified because of this submission is listed in Attachment A.

Purpose

This partial supplemental Tier 2 Advice Letter (or AL) is submitted as directed by Energy Division staff to amend the COVID-19 Pandemic Protections Memorandum Account (CPPMA) included in Southwest Gas' AL 1130-B submitted on August 11, 2020.

Background

In accordance with Ordering Paragraph 2 in Commission Resolution M-4842, *Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic* (Resolution), Southwest Gas submitted AL 1130-A to replace in its entirety AL 1130, which was submitted on March 25, 2020. AL 1130-A included the establishment of the CPPMA and addressed new requirements pertaining to EDRP Customer Protections implemented and those not implemented in response to COVID-19 as well as Southwest Gas' Communications and Outreach Plan pertaining to COVID-19

AL 1130-B partially supplemented AL 1130-A at the direction of Energy Division Staff to offer additional clarifications and modify the CPPMA.

CPPMA Modification

Pursuant to additional Energy Division directive, Southwest Gas submits this Advice Letter to make the following modifications to its CPPMA submitted in AL 1130-G-B:



Advice Letter No. 1130-G-C
Page 2
September 16, 2020

PURPOSE

Pursuant to Resolution M-4842, dated April 16, 2020, the purpose of the CPPMA is to record incremental costs and waived charges incurred by the Company associated with its implementation of the COVID-19 customer protections as outlined in Advice Letter No. 1130-A, **as clarified in Advice Letter No. 1130-G-B**. The COVID-19 customer protections apply to all Residential and Small Business Customers (non-residential customers) with an annual consumption of less than 10,000 therms **and as defined in Rule No. 1-Definitions of this California Gas Tariff**. The CPPMA is effective March 4, 2020.

APPLICABILITY

The CPPMA balance will be recovered from ~~all customer classes, excluding customers served under a Special Contract or any other exclusion provided for~~ **customers as authorized** by the Commission.

This Advice Letter only partially supplements AL 1130-B to modify the CPPMA as noted above.

Effective Date

Pursuant to OP 2 in the Resolution, this Advice Letter is classified as Tier 2 (Effective after Energy Division Disposition). Southwest Gas respectfully requests this Advice Letter be made effective on March 4, 2020, which is the effective date of the Governor Newsom's State of Emergency Declaration for the COVID-19 Pandemic.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. In accordance with Energy Division directive, Southwest Gas requests a shortened protest and reply period of five (5) days. Therefore, the protest must be sent no later than five (5) 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



Advice Letter No. 1130-G-C
Page 3
September 16, 2020

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 in GO 96-B since this Advice Letter is submitted in compliance with OP 2 of the Resolution and will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule, except as noted herein.

Service

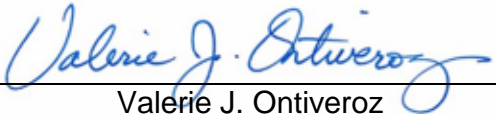
In accordance with GO 96-B, General Rule 7.2, Southwest Gas is mailing copies of this Advice Letter and related tariff sheets to the utilities and interested parties shown on the attached list. Southwest Gas will also serve this Advice Letter to all individuals on the established service list in Rulemaking 18-03-011.

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

Distribution List

Advice Letter No. 1130-G-C

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

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SDG&ETariffs@SempraUtilities.com

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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. 1130-G-C

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original Sheet No. 45.17	Preliminary Statement – (continued)	---

PRELIMINARY STATEMENT
(Continued)

33. COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA)

33A. PURPOSE

Pursuant to Resolution M-4842, dated April 16, 2020, the purpose of the CPPMA is to record incremental costs and waived charges incurred by the Company associated with its implementation of the COVID-19 customer protections as outlined in Advice Letter No. 1130-A, as clarified in Advice Letter No. 1130-G-B. The COVID-19 customer protections apply to all Residential and Small Business Customers (non-residential customers) with an annual consumption of less than 10,000 therms and as defined in Rule No. 1-Definitions of this California Gas Tariff. The CPPMA is effective March 4, 2020.

33B. APPLICABILITY

The CPPMA balance will be recovered from customers as authorized by the Commission.

33D. ACCOUNTING PROCEDURES

For costs associated with the implementation of the COVID-19 customer protections, the Company shall will make the following entries to the CPPMA at the end of each month, net of Franchise Fees and Uncollectibles (FF&U), where applicable:

- a. A debit entry equal to the actual operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return);
- b. A debit entry equal to waived charges;
- c. A debit entry for incremental uncollectible expenses;
- d. A debit entry for other incremental costs; and
- e. An entry to record interest on the CPPMA balance calculated as set forth in Section 12B of this Preliminary Statement.

Costs recorded in the CPPMA will be tracked by customer class.

33D. DISPOSITION

Costs recorded in the CPPMA may be recovered in rates only after a request by the Company and approval by the Commission either through a general rate case or other applicable proceeding.

N
N



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

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:

Summarize differences between the AL and the prior withdrawn or rejected AL:

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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

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

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



SOUTHWEST GAS CORPORATION

August 11, 2020

Advice Letter No. 1130-G-B

(U 905 G)

Public Utilities Commission of the State of California

Subject: Implementation of Emergency Disaster Relief Program in Southwest Gas Corporation's Service Territory in Response to the COVID-19 State of Emergency Declaration Pursuant to Decision 19-07-015 and Resolution M-4842

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 sheet being modified because of this submission is listed in Attachment A.

Purpose

This partial supplemental Tier 2 Advice Letter is submitted as directed by Energy Division staff to amend or clarify certain aspects of Southwest Gas' Advice Letter No. 1130-A submitted on May 1, 2020 (AL 1130-A). AL 1130-A was submitted in accordance with Ordering Paragraph (OP) 2 of Resolution M-4842, *Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic*, and replaced in its entirety Advice Letter No. 1130, which was submitted on March 25, 2020 (AL 1130).

Background

On April 16, 2020, the Commission adopted Resolution M-4842 (Resolution) ratifying the directives issued in the March 17, 2020 Letter from Executive Director Alice Stebbins implementing Emergency Disaster Relief Program (EDRP) customer protections. The Resolution recognizes that "The COVID-19 pandemic represents a different type of emergency, one where the threat – in this case, a virus—necessitates a response which impacts Californians' ability to pay for utility service...Therefore...the Commission extends to California customers the emergency customer protections from D.19-07-015...through April 16, 2021, with an option to extend."¹ All residential and small business customers in California are eligible for the emergency customer protections.²

¹ Resolution, at pgs. 3-4.

² *Id.*, at pg. 4.



OP 2 in the Resolution states:

To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, electric, gas, communications, and water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the emergency customer protections adopted in D.19-07-015 and D.19-08-025 to support California customers.³

Southwest Gas' submitted AL 1130-A in compliance with OP 2, which included the establishment of the COVID-19 Pandemic Protections Memorandum Account (CPPMA) and addressed new requirements pertaining to EDRP Customer Protections implemented and those not implemented in response to COVID-19 as well as Southwest Gas' Communications and Outreach Plan pertaining to COVID-19.

Pursuant to the July 2020 directive from the Energy Division, Southwest Gas submits this partial supplement to clarify the eligibility requirements for the customer protections, including California Alternate Rates for Energy (CARE) program customers and Medical Baseline customers and to amend or further clarify the CPPMA.

EDRP Customer Protections Implemented in Response to COVID-19 Clarifications

In AL 1130-A, Southwest Gas detailed which EDRP customer protections it has implemented in response to COVID-19 until April 16, 2021, or until the Commission deems otherwise. Southwest Gas provides the following additional clarifications:

- **Suspend disconnections for non-payment and waiver of deposits and late fee requirements**

In AL 1130-A, Southwest Gas explained that it will suspend disconnections for non-payment for all customers (residential and non-residential) as well as waive deposits and late payment fees for residential customers who self-identify that they are impacted by COVID-19.

Pursuant to Energy Division directive, Southwest Gas will remove the requirement for customers to "self-identify". Additionally, consistent with the Resolution, Southwest Gas clarifies that the EDRP Customers Protections apply to residential and small business customers only. Small business customers are customers who meet the following definition:

³ *Id.* at pg. 12.



Any non-residential customer with an annual consumption of less than 10,000 therms or any non-residential customer who demonstrates to the Company's satisfaction that they meet the definition of "micro-business" pursuant to California Government Code Section 14837.

- **Additional protections for income-qualified customers**

Southwest Gas stated in AL 1130-A that it has suspended recertification requests for the Medical Baseline Allowance program. Southwest Gas confirms that customers receiving additional baseline for medical purposes will not be required to recertify their eligibility until after April 16, 2021, as applicable.

Additionally, the Resolution requires a freeze of all standard and high-usage reviews for the CARE program eligibility for 12 months and potentially longer, as warranted. Utilities are to contact all community outreach contractors, the community-based organizations (CBOs) who assist in enrolling hard-to-reach low-income customers into CARE, to help better inform customers of these eligibility changes. In AL 1130-A, Southwest Gas informed that it does not perform standard or high-usage reviews for CARE program eligibility, so this customer protection is not applicable. Therefore, Southwest Gas did not need to inform CBOs regarding this CARE program eligibility customer protection.

- **Meet and Confer with Community Choice Aggregators to discuss Roles and Responsibilities regarding EDRP customer protections**

In AL 1130-A, Southwest Gas explained that although it does not have Community Choice Aggregators, the Company would confer with its Core Transport Agent to ensure adequate protections are provided. Additionally through this partial supplement, Southwest Gas confirms that it does not perform any billing services on behalf of its Core Transport Agent.

Clarification of Costs to be Tracked and Appropriate Account

The Resolution states:

In order to allow for recovery of expenses reasonably incurred while complying with this Resolution, electric and gas utilities subject to this Resolution shall each establish a COVID-19 Pandemic Protections Memorandum Account (CPPMA), to book only those costs associated with protections ordered by this Resolution. The recorded costs must meet the following conditions: (1) those ordered by this Resolution; and (2) incurred starting with the date of the Governor's emergency declaration - March 4, 2020.⁴

⁴ *Id.* at pg. 6.



Southwest Gas stated in AL 1130-A:

Pursuant to OP 4 of the Resolution, Southwest Gas requests authorization to track and record expenses and lost revenues associated with its implementation of the COVID-19 customer protections. However, as the Resolution states, these customer protections are a floor and not a ceiling and the Commission supports and encourages the utilities to do more to help Californians in this time of need.⁵ As such, Southwest Gas requests to track additional costs as it deems necessary to assist or protect its customers through April 16, 2021.

Southwest Gas interpreted the Resolution as authorization to track and recover all costs associated with the implementation of the COVID-19 EDRP Customer Protections. Per Energy Division request, Southwest Gas clarifies that “lost revenues” are late payment fees or other fee waivers. Also, Southwest Gas expects it may incur additional costs that may include items such as software, programming or personal protective equipment to implement the EDRP customer protections. Additionally, Southwest Gas will record uncollectible expenses incremental to the amounts adopted in its applicable general rate case.

Finally, in AL 1130, Southwest Gas stated that it would track costs related to the EDRP customer protections for COVID-19 in its EDRP memorandum account (EDRPMA). However, per the Resolution, utilities were directed to establish the CPPMA to track costs related to the implementation of COVID-19 EDRP customer protections. As such, through AL 1130-A, Southwest Gas established the CPPMA and will track costs related to the implementation of the COVID-19 EDRP customer protections in its CPPMA and not in its EDRPMA.

CPPMA Clarifications

Per the Resolution, all residential and small business customers (as defined above) are eligible for the COVID-19 EDRP customer protections. Southwest Gas has amended the “Purpose” section of the CPPMA to define its application for costs related to residential and small business customers.

Also, as directed by Energy Division staff, Southwest Gas has included “Accounting Procedures” in its CPPMA, including that Southwest Gas will track costs by customer class.

This Advice Letter only partially supplements its AL 1130-A to provide the additional clarifications as described herein.

⁵ *Ibid*, at pg. 4.



Advice Letter No. 1130-G-B
Page 5
August 11, 2020

Effective Date

Pursuant to OP 2 in the Resolution, this Advice Letter is classified as Tier 2 (Effective after Energy Division Disposition). Southwest Gas respectfully requests this Advice Letter be made effective on March 25, 2020, which is the originally requested effective date for Advice Letter Nos. 1130 and 1130-A.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. In accordance with the Resolution, Southwest Gas requests a shortened protest and reply period of five (5) days. Therefore, the protest must be sent no later than five (5) 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 in GO 96-B since this Advice Letter is submitted in compliance with OP 2 of the Resolution and will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule, except as noted herein.



Advice Letter No. 1130-G-B
Page 6
August 11, 2020

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. Southwest Gas will also serve this Advice Letter to all individuals on the established service list in Rulemaking 18-03-011.

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

Distribution List

Advice Letter No. 1130-G-B

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

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PGETariffs@pge.com

Southern California Gas Company
ROrtiz@SempraUtilities.com

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

Robert M. Pocta
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ATTACHMENT A
Advice Letter No. 1130-G-B

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
Original Sheet No. 45.17	Preliminary Statement – (continued)	---

PRELIMINARY STATEMENT
(Continued)

33. COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA)

33A. PURPOSE

Pursuant to Resolution M-4842, dated April 16, 2020, the purpose of the CPPMA is to record incremental costs and waived charges incurred by the Company associated with its implementation of the COVID-19 customer protections as outlined in Advice Letter No. 1130-A. The COVID-19 customer protections apply to all Residential and Small Business Customers (non-residential customer) with an annual consumption of less than 10,000 therms. The CPPMA is effective March 4, 2020.

33B. APPLICABILITY

The CPPMA balance will be recovered from all customer classes, excluding customers served under a Special Contract or any other exclusion provided for by the Commission.

33D. ACCOUNTING PROCEDURES

For costs associated with the implementation of the COVID-19 customer protections, the Company shall will make the following entries to the CPPMA at the end of each month, net of Franchise Fees and Uncollectibles (FF&U), where applicable:

- a. A debit entry equal to the actual operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return);
- b. A debit entry equal to waived charges;
- c. A debit entry for incremental uncollectible expenses;
- d. A debit entry for other incremental costs; and
- e. An entry to record interest on the CPPMA balance calculated as set forth in Section 12B of this Preliminary Statement.

Costs recorded in the CPPMA will be tracked by customer class.

33D. DISPOSITION

Costs recorded in the CPPMA may be recovered in rates only after a request by the Company and approval by the Commission either through a general rate case or other applicable proceeding.



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

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:

Summarize differences between the AL and the prior withdrawn or rejected AL:

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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

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



SOUTHWEST GAS CORPORATION

May 1, 2020

Advice Letter No. 1130-G-A

(U 905 G)

Public Utilities Commission of the State of California

Subject: Implementation of Emergency Disaster Relief Program in Southwest Gas Corporation's Service Territory in Response to the COVID-19 State of Emergency Declaration Pursuant to Decision 19-07-015 and Resolution M-4842

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 because of this submission are listed in Attachment A.

Purpose

This supplemental Tier 2 Advice Letter is submitted in accordance with Ordering Paragraph (OP) 2 of Resolution M-4842, *Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the COVID-19 Pandemic*, and replaces in its entirety Advice Letter No. 1130, which was submitted on March 25, 2020. Advice Letter No. 1130 implemented the Emergency Disaster Relief Program customer protections in Response to the COVID-19 State of Emergency Declaration and the March 17, 2020 Letter from Executive Director Alice Stebbins (Ms. Stebbins' Letter).

Background

In July 2019, the Commission issued D.19-07-015, which established a permanent set of emergency disaster customer protection measures that utilities are mandated to implement in the event the Governor of California or the President of the United States declares a state of emergency and the disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service. Pursuant to OP 2 in D.19-07-015, utilities must submit a Tier 1 Advice Letter within 15 days of a state of emergency declaration.

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19 to make additional resources available, formalize emergency actions already underway across multiple state agencies and departments, and help the State of California in the event of a broader spread of COVID-19. On March 13, 2020, Southwest



Gas implemented a temporary moratorium on disconnections for non-payment for residential customers.

Subsequently on March 17, 2020, Ms. Stebbins' Letter was issued acknowledging that although COVID-19 has not resulted in the same disruptions or degradations to utility service, the energy utilities are directed to extend the same applicable customer protections adopted in D.19-07-015 to customers in response to the declared state of emergency due to the spread of COVID-19. The utilities were further directed "...to report to the [Commission] on all customer protection measures they implement in response to COVID-19 as soon as they are implemented, so that the [Commission] may publicly report on these measures. These customer protections should be retroactively applied to March 4, 2020."

On April 16, 2020, the Commission adopted Resolution M-4842 (Resolution) ratifying the directives issued in Ms. Stebbins' Letter. The Resolution recognizes that "The COVID-19 pandemic represents a different type of emergency, one where the threat – in this case, a virus—necessitates a response which impacts Californians' ability to pay for utility service...Therefore...the Commission extends to California customers the emergency customer protections from D.19-07-015...through April 16, 2021, with an option to extend."¹ All residential and small businesses customers in California are eligible for the emergency customer protections.²

OP 2 in the Resolution states:

To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, electric, gas, communications, and water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter describing all reasonable and necessary actions to implement the emergency customer protections adopted in D.19-07-015 and D.19-08-025 to support California customers.

Although, Southwest Gas' initial Advice Letter No. 1130 generally complies with the directives in the Resolution, the Company submits this supplement to clarify certain aspects or address new requirements pertaining to the following:

1. The effective date of the customer protections through April 16, 2021;
2. EDRP Customer Protections implemented and not implemented in response to COVID-19;
3. Communications and Outreach Plan pertaining to COVID-19; and
4. Establishment of the COVID-19 Pandemic Protections Memorandum Account.

¹ Resolution M-4842, at pgs. 3-4.

² *Ibid*, at pg. 4.



EDRP Customer Protections Implemented in Response to COVID-19

Although COVID-19 has neither 1) resulted in the loss or disruption of the delivery or receipt of natural gas service; nor 2) resulted in the degradation of the quality natural gas service, Southwest Gas recognizes that its customers may be impacted and experience financial hardship in relation to COVID-19. Therefore, Southwest Gas has implemented the following applicable EDRP customer protections until April 16, 2021, or until the Commission deems otherwise:

- **Suspend disconnections for non-payment and waiver of deposits and late fee requirements**

Southwest Gas has suspended disconnections for non-payment for all customers (residential and non-residential). Additionally, Southwest Gas will waive deposits for residential customers who self-identify that they are impacted by COVID-19. Southwest Gas has automatically waived deposit requirements for all non-residential customers, including small businesses. Southwest Gas has also suspended the collection of late fees and the reporting of late payments to credit reporting agencies or to other credit/collection services for all customers. Southwest Gas will not apply interest on outstanding balances. Southwest Gas has also instructed its third-party collections representative to suspend contacting customers regarding outstanding balances.

Given the retroactive effective date of these customer protections to March 4, 2020, Southwest Gas assessed customer accounts who were disconnected for non-payment between March 4 through 12, 2020, and restored service at the customer's request with or without the requirement of payment, including service reestablishment fees and deposits. Southwest Gas also credited any service reestablishment fees, late fees and deposits for customers who had already restored their service during this period.

Finally, all disconnect notifications due to non-payment or late payment, including outbound dialer calls have been suspended for all customers.

- **Flexible payment plan options**

For customers with an outstanding balance who inform Southwest Gas that they are impacted by COVID-19 resulting in their displacement, the following payment plan will be offered when establishing service at a new residence:

- The customer's first payment will be no greater than 20% of the total outstanding balance. The remainder of the balance will be billed in not less than twelve equal monthly installments.



For impacted customers with active gas service who develop an outstanding balance, the following payment plan will be offered on the outstanding balance:

- The customer's first payment will be no greater than 20% of the total outstanding balance. The remainder of the balance will be billed in not less than eight equal monthly installments.

Southwest Gas will not penalize a customer for paying off an outstanding balance more quickly than the established payment plan. Additionally, Southwest Gas will not accrue interest on an impacted customer's outstanding balance.

- **Additional protections for income-qualified customers**

Southwest Gas has immediately suspended California Alternate Rates for Energy (CARE) program removals for residential customers, as well as recertification and income verification requests for CARE.

Given the retroactive effective date of these customer protections to March 4, 2020, Southwest Gas reenrolled the customers into the CARE program that were previously removed between March 4 and March 17, 2020. A notification was sent to these customers informing them of their reenrollment into the CARE program and that no additional action was required by them.

Southwest Gas will also suspend recertification requests for the Medical Baseline Allowance.

Additionally, Southwest Gas' customer funded Energy Share Program offers bill assistance to customers who either income qualify or experience an emergency. Customers may receive assistance from this program one-time in a twelve (12) month period. Southwest Gas has informed its program administrators to permit a customer to receive assistance more than once in a twelve (12) month period on a case by case basis.

EDRP Customer Protections Not Implemented

Given the uniqueness of the COVID-19 state of emergency, Southwest Gas will not implement the following protections since these protections were designed for customers who needed to relocate from damaged structures arising from wildfires, earthquakes or other disasters:

1. Authorizing expedited move-in and move-out service requests;
2. Suspension of estimated energy usage for billing;
3. Identifying the premises of affected customers whose utility service has been disrupted or degraded, and discontinuing billing;
4. Proration of monthly access charges or minimum charges; and



5. Offering repair processing and timing assistance and timely access to utility customers pursuant to Section 8386(c)(18).

While D.19-07-015 and the Resolution require the following to provide further assistance to income-qualified customers, these are inapplicable to Southwest Gas:

1. Freeze all standard and high-usage reviews for the CARE program eligibility for 12 months; and
2. Indicate how the Energy Savings Assistance (ESA) program can be deployed to assist impacted customers.

Southwest Gas does not perform standard or high-usage reviews for its CARE program, so this item is not applicable. Also, with respect to the ESA program, the above item was intended to assist customers primarily impacted by wildfires, earthquakes or other disasters. Since March 25, 2020 Southwest Gas has suspended its ESA program to protect Southwest Gas employees, customers and contractor personnel from the spread of COVID-19.

Finally, as a gas utility, Southwest Gas does not have Community Choice Aggregators, so this item does not apply. However, Southwest Gas will confer with its Core Transport Agent to ensure adequate protections are provided.

Communication and Outreach Plan for the EDRP Customer Protections

Southwest Gas has communicated the availability of the above EDRP COVID-19 customer protections to its customers through press releases, media statements, announcements on social media platforms and email blasts. A dedicated Interactive Voice Response (IVR) prompt has been established for California customers to access information regarding the COVID-19 customer protections. Southwest Gas customers will also be directed to access www.swgas.com/edrp or to contact Customer Assistance at 1-877-860-6020 for additional information on the specific COVID-19 customer protections enacted.

COVID-19 Pandemic Protections Memorandum Account (CPPMA)

Pursuant to OP 4 of the Resolution, Southwest Gas requests authorization to track and record expenses and lost revenues associated with its implementation of the COVID-19 customer protections. However, as the Resolution states, these customer protections are a floor and not a ceiling and the Commission supports and encourages the utilities to do more to help Californians in this time of need.³ As such, Southwest Gas requests to track additional costs as it deems necessary to assist or protect its customers through April 16, 2021. The costs recorded in the CPPMA will be tracked beginning March 4, 2020, which is the date of the Governor's State of Emergency declaration and continue until April 16,

³ *Ibid*, at pg. 4.



Advice Letter No. 1130-G-A
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May 1, 2020

2021. Pursuant to the Resolution, the review of the CPPMA costs for recovery in rates will be conducted in a general rate case or other applicable proceeding.

This Advice Letter will not increase any rate or charge, cause the withdrawal of service or conflict with any schedule. The EDRP COVID-19 customer protections implemented as a result of this Advice Letter will supersede, on a temporary basis from March 4, 2020 through April 16, 2021, the applicable requirements in the following Southwest Gas Tariff Rules:

- Rule No. 3 – Application for Service
- Rule No. 6 – Establishment and Reestablishment of Credit
- Rule No. 7 – Deposits
- Rule No. 9 – Rendering and Payment of Bills
- Rule No. 11 – Discontinuance of Service

Effective Date

Pursuant to OP 2 in the Resolution, this Advice Letter is classified as Tier 2 (Effective after Energy Division Disposition). Southwest Gas respectfully requests this Advice Letter be made effective on March 25, 2020, which is the originally requested effective date for Advice Letter No. 1130.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. In accordance with the Resolution, Southwest Gas requests a shortened protest and reply period of five (5) days. Therefore, the protest must be sent no later than five (5) 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:



Advice Letter No. 1130-G-A
Page 7
May 1, 2020

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 in GO 96-B since this Advice Letter is submitted in compliance with OP 2 of the Resolution and will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule, except as noted herein.

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. Southwest Gas will also serve this Advice Letter to all individuals on the established service list in Rulemaking 18-03-011.

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

Distribution List

Advice Letter No. 1130-G-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

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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. 1130-G-A

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
11th Revised Sheet No. 2	Table of Contents	10th Revised Sheet No. 2
Original Sheet No. 45.17	Preliminary Statement – (continued)	---

SOUTHWEST GAS CORPORATION

P.O. Box 98510

Las Vegas, Nevada 89193-8510

California Gas Tariff

Canceling 11th Revised Cal. P.U.C. Sheet No. 2
10th Revised Cal. P.U.C. Sheet No. 2

TABLE OF CONTENTS

The following listed sheets contain all the effective rates and rules affecting rates and service and information relating thereto in effect on and after the date indicated thereon.

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Statement of Rates	65 – 73
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Advice Letter No. 1130-A
Decision No. _____

Issued by
Justin Lee Brown
Senior Vice President

Date Filed May 1, 2020
Effective _____
Resolution No. M-4842

PRELIMINARY STATEMENT
(Continued)

33. COVID-19 PANDEMIC PROTECTIONS MEMORANDUM ACCOUNT (CPPMA)

33A. PURPOSE

Pursuant to Resolution M-4842 adopted by the Commission on April 16, 2020 in response to Governor Newsom's State of Emergency Declaration on March 4, 2020 regarding the COVID-19 pandemic, the purpose of the CPPMA is to record all incremental costs and lost revenues incurred by the Company associated with its implementation of the COVID-19 customer protections as outlined in Advice Letter No. 1130-A. The CPPMA is effective from March 4, 2020 through April 16, 2021.

33B. TRACKING PROCEDURES

The Company shall track the financial impact in the CPPMA at the end of each month, commencing on March 4, 2020. Interest on the tracked balance will be calculated as set forth in Section 12B of this Preliminary Statement.

33C. APPLICABILITY

The CPPMA balance will be recovered from all customer classes, unless specifically requested for exclusion by the Company.

33D. DISPOSITION

Costs recorded in the CPPMA may be recovered in rates only after a request by the Company and approval by the Commission either through a general rate case or other applicable proceeding.

N
N



ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

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:

Summarize differences between the AL and the prior withdrawn or rejected AL:

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

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

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