

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Southwest Gas Corporation
GAS (Corp ID 905)
Status of Advice Letter 1148G
As of July 13, 2021

Subject: Request for Deviation from Tariff Rate Schedule No. GS-66.

Division Assigned: Energy

Date Filed: 10-26-2020

Date to Calendar: 10-28-2020

Authorizing Documents: None

Disposition:

Signed

Effective Date:

11-25-2020

Resolution Required: Yes

Resolution Number: G-3582

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Valerie J. Ontiveroz

702 876-7323

valerie.ontiveroz@swgas.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION G-3579
June 3, 2021

R E S O L U T I O N

Resolution G-3579. Southern California Gas Company's 2020 Annual Compliance Report on System Operator's Southern System Reliability Purchases and Sales (September 1, 2019–September 30, 2020).

PROPOSED OUTCOME:

- Approves Southern California Gas Company's (SoCalGas) 2020 Annual Compliance Report.

SAFETY CONSIDERATIONS:

- There are no safety considerations associated with this resolution.

ESTIMATED COST:

- There are no costs associated with this resolution.

By Advice Letter 5719-G Filed on October 30, 2020.

SUMMARY

This resolution approves SoCalGas' Annual Compliance Report (ACR) on the Utility System Operator's Southern System Reliability Purchases and Sales for the period from September 1, 2019, through September 30, 2020. SoCalGas had no procurement activity to report for this period. Pipeline outages and maintenance on the SoCalGas Northern System resulted in increased utilization of the Southern System receipt points. Thus, SoCalGas had sufficient supplies on the Southern System during the reporting period without engaging in procurement activity.

BACKGROUND

This resolution serves to dispose of Advice Letter 5719-G. SoCalGas is required to file this advice letter annually pursuant to Decision (D.) 09-11-006, Resolution G-3542, and SoCalGas Rule No. 41, Section 26. Specifically, SoCalGas is required to provide a report by November 1 of each year demonstrating that its Operational Hub's procurement activities during the preceding 12 months ending September 30 were in compliance with the standards, criteria, and procedures set forth in Rule No. 41.

The purpose of these activities is to allow SoCalGas' System Operator to maintain reliability of service on its Southern System. The southern part of the SoCalGas gas transmission pipeline system (the Southern System) requires a minimum amount of gas flow to operate reliably. Prior to 2009, the utility's Gas Acquisition Department maintained minimum gas flow into the Southern System using core customer assets. This responsibility was transferred to the System Operator by D.07-12-019, effective April 1, 2009. Previous resolutions and advice letters have authorized various means for the System Operator to meet Southern System reliability requirements, including the ability to buy and sell gas on a spot basis.

Resolution G-3542 was issued on October 25, 2018, and included the following in Ordering Paragraph (OP) 3:

SoCalGas shall submit its next ACR on November 1, 2018, to show gas purchases during the 13-month period from September 1, 2017, through September 30, 2018. After November 1, 2018, ACRs shall be filed annually on November 1st in order to show gas purchases for the 12-month period from October 1st through September 30th.

NOTICE

SoCalGas states that a copy of Advice Letter 5719 was mailed and distributed in accordance with General Order 96-B and the service list for SoCalGas/SDG&E's Triennial Cost Allocation Proceeding (TCAP), A.18-07-024.

PROTESTS

Advice Letter 5719 was not protested.

DISCUSSION

The Commission has reviewed the advice letter and finds that SoCalGas adhered to the requirements set forth in Rule No. 41 in filing an Annual Compliance Report for the reporting period, October 1, 2018, through September 30, 2019. SoCalGas had no procurement activity to report for this period. Pipeline outages and maintenance on the SoCalGas Northern System contributed to increased utilization of the Southern System receipt points. SoCalGas had sufficient supplies on the Southern System during the reporting period without the System Operator engaging in spot purchases or winter or summer baseload contracts.

COMMENTS

This is an uncontested matter in which the resolution grants the relief requested. Accordingly, pursuant to PU Code 311(g)(2), the otherwise applicable 30-day period for public review and comment is being waived.

FINDINGS

1. Decision 09-11-006 directed SoCalGas to file an advice letter on October 1st of each year demonstrating that the Operational Hub's purchases in support of the Southern System during the previous 12 months ending August 31st were in compliance with the standards described in Rule 41.
2. Resolution G-3542 changed the due date of the Annual Compliance Report to November 1st of each year and directed SoCalGas to show gas purchases for the 12-month period from October 1st through September 30th.
3. SoCalGas had sufficient supplies on the Southern System during the reporting period without engaging in procurement activity.
4. SoCalGas had no procurement activity to report for the 2019-2020 reporting period.

THEREFORE IT IS ORDERED THAT:

1. SoCalGas Advice Letter 5719-G is approved.

This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 3, 2021 the following Commissioners voting favorably thereon:

/s/ Rachel Peterson
Rachel Peterson

Executive Director
MARYBEL BATJER
President

MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
DARCIE HOUCK
Commissioners"

ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: Southwest Gas Corporation Date Utility Notified: 3/24/21 via: e-mail
Utility No./Type GAS [x] E-Mail to: valerie.ontiveroz@swgas.com
Advice Letter No. 1148-G Fax No.: N/A
Date AL filed: 10/26/20 ED Staff Contact: Karin Sung
Utility Contact Person: Valerie Ontiveroz
Utility Phone No. (702) 876-7323

For Internal Purposes Only:

Date Calendar Clerk Notified: ___/___/___
Date Commissioners/Advisors Notified: ___/___/___

[X] INITIAL SUSPENSION (up to 120 DAYS)

This is to notify that the above-indicated AL is suspended for up to 120 days beginning 3/24/21 for the following reason(s) below. If the AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division extends beyond the expiration of the initial suspension period, the advice letter will be automatically suspended for up to 180 days beyond the initial suspension period.

[] Section 455 Hearing is Required.

[] Advice Letter Requests a Commission Order.

[X] Advice Letter Requires Staff Review

Expected duration of initial suspension period: 30 days.

[] FURTHER SUSPENSION (up to 180 DAYS beyond initial suspension period)

The AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division has extended beyond the expiration of the initial suspension period. The advice letter is suspended for up to 180 days beyond the initial suspension period.

If you have any questions regarding this matter, please contact Karin Sung at (213) 266-4743 or via e-mail at karin.sung@cpuc.ca.gov.

cc: ED Tariff Unit

ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: Southwest Gas Corporation Date Utility Notified: 11/30/20 via: e-mail
Utility No./Type GAS [x] E-Mail to: valerie.ontiveroz@swgas.com
Advice Letter No. 1148-G Fax No.: N/A
Date AL filed: 10/26/20 ED Staff Contact: Karin Sung
Utility Contact Person: Valerie Ontiveroz
Utility Phone No. (702) 876-7323

For Internal Purposes Only:

Date Calendar Clerk Notified: ___/___/___
Date Commissioners/Advisors Notified: ___/___/___

[X] INITIAL SUSPENSION (up to 120 DAYS)

This is to notify that the above-indicated AL is suspended for up to 120 days beginning 11/25/20 for the following reason(s) below. If the AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division extends beyond the expiration of the initial suspension period, the advice letter will be automatically suspended for up to 180 days beyond the initial suspension period.

[] Section 455 Hearing is Required.

[] Advice Letter Requests a Commission Order.

[X] Advice Letter Requires Staff Review

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If you have any questions regarding this matter, please contact Karin Sung at (213) 266-4743 or via e-mail at karin.sung@cpuc.ca.gov.

cc: ED Tariff Unit



SOUTHWEST GAS CORPORATION

November 23, 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. 1148 – Substitution

Enclosed is an original of Southwest Gas Corporation's (Southwest Gas) Advice Letter No. (AL) 1148. AL 1148 was submitted on October 26, 2020, to request a deviation from tariff Schedule No. GS-66-Small Electric Power Generation Gas Service for Victor Valley Wastewater Reclamation Authority.

The purpose of this submission is to correct AL 1148 by removing the "A" supplement designation in the title and the headers of AL 1148. As submitted, AL 1148 is noted as "Advice Letter No. 1148-G-A" when it should be "Advice Letter No. 1148-G". AL 1148 is the originally submitted Advice Letter and is not a supplement. Pursuant to the direction of Energy Division Staff, Southwest Gas is permitted to submit this substitute AL to revise the Advice Letter designation. There are no tariff sheets associated with AL 1148 and all other references in the Advice Letter are correctly noted.

Southwest Gas respectfully requests that the enclosed substitute AL 1148 replace the originally submitted AL 1148.

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

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachment

c: Karin Sung, CPUC Energy Division
karin.sung@cpuc.ca.gov



SOUTHWEST GAS CORPORATION

October 26, 2020

Advice Letter No. 1148-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Request for Deviation from Tariff Rate Schedule No. GS-66

Southwest Gas Corporation (Southwest Gas or Company) hereby submits for approval by the California Public Utilities Commission (Commission) revisions to its California Gas Tariff. There are no tariff sheets being modified as a result of this submission.

Purpose

This purpose of this submission is to request a deviation from tariff Schedule No GS-66 - Small Electric Power Generation Gas Service for Southwest Gas to provide service at Victor Valley Wastewater Reclamation Authority (VWVRA) in Victorville, California to become effective upon the execution of a contract with VWVRA in the first quarter 2021. This Advice Letter is submitted in accordance with General Order (GO) 96-B, Industry Rule 7.

Background

In 2006, California passed the historic Global Warming Solutions Act of 2006, or Assembly Bill 32, which created a comprehensive, multi-year program to reduce Greenhouse Gas (GHG) emissions in California to 1990 levels by 2020. In 2016, California passed Senate Bill (SB) 32, which further expanded the State's GHG emission reductions goals to 40% below 1990 levels by 2030. Also, in 2016 California passed SB 1383 establishing statewide emission reduction goals of short-lived climate pollutants, specifically 40% of methane emissions below 2013 levels by 2030.

Given that renewable gas reduces fugitive methane emissions from the agricultural and waste sectors and displaces traditional natural gas, renewable gas, and the incorporation of it into the utilities' gas portfolio mix, is vital in helping California achieve these goals.

In May 2019, SoCal Biomethane, LLC (SoCal Biomethane) entered into a contract with VWVRA, a wastewater treatment facility, to convert its flared biogas into pipeline quality renewable gas for transportation use. The initial volume is approximately 165,000 MMBTU per year. In the future, the same facility will be used to divert food waste from landfills, another significant contributor to GHG emissions through landfill methane emissions.



Additionally, Southwest Gas has been working with SoCal Biomethane to install gas facilities, in accordance with its tariff Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System,¹ on the existing high-pressure system located at VVWRA to receive renewable gas at a proposed interconnection point. On February 2020, Southwest Gas executed a Letter Agreement to begin the Detailed Engineering Study for these facilities.² Finally, in September 2020, Southwest Gas executed contracts with SoCal Biomethane for the purchase, at SoCal Biomethane’s option, of either the “brown gas” or the renewable gas produced at its VVWRA facility.^{3,4} “Brown gas” refers to the physical molecules of methane produced by a renewable gas production facility minus any of the environmental attributes produced by the facility.

Because a portion of the raw biogas currently feeds the natural gas generators at VVWRA, Southwest Gas will contract with VVWRA to supply natural gas to a second meter for the purpose of fueling the generators. Southwest Gas anticipates this contract to be executed in the first quarter of 2021.

Request for Deviation from Schedule No. GS-66 – Small Electric Power Generation Gas Service

Southwest Gas’ receipt of renewable gas will offset the amount of natural gas required to transport or purchase from its upstream suppliers to serve its customers. As such, VVWRA should not be subject to the transportation service charges Southwest Gas would otherwise recover from its customers for the renewable gas injected into Southwest Gas’ system. The following illustration depicts this transaction in simple form:

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¹ Southwest Gas submitted Advice Letter No. 1147-G to replace its existing Rule No. 22 with the Standard Renewable Gas Interconnections to the Utility’s Pipeline System tariff adopted in Decision (D.) 20-08-035, as modified by D.20-09-042. The impending construction and installation of the renewable gas facilities will be subject to the new tariff rule adopted in D.20-08-035.

² More recently, in September 2020, Southwest Gas executed a subsequent Letter Agreement to procure materials for the project.

³ These contracts require Southwest Gas to submit this instant Advice Letter on or before October 31, 2020.

⁴ D.20-05-003 authorized Southwest Gas to modify its Gas Cost Incentive Mechanism to incorporate a Biomethane Gas Plan (BGP) as a method to treat costs associated with the purchase or sale of biomethane or renewable gas.



Natural Gas Displacement from Upstream Pipeline with addition of Renewable Gas

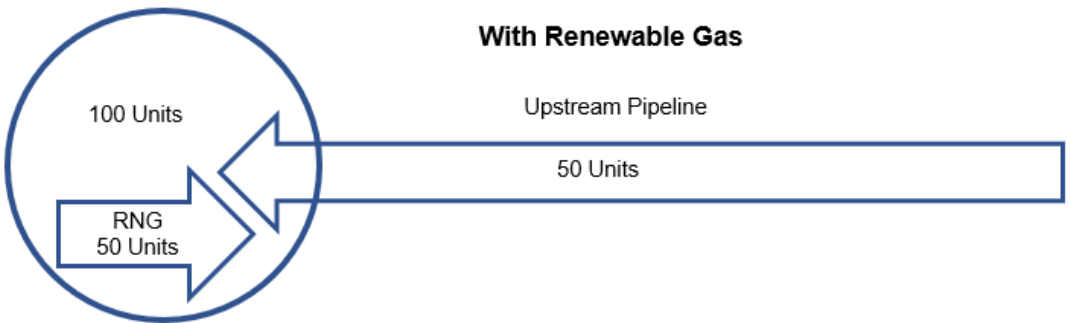
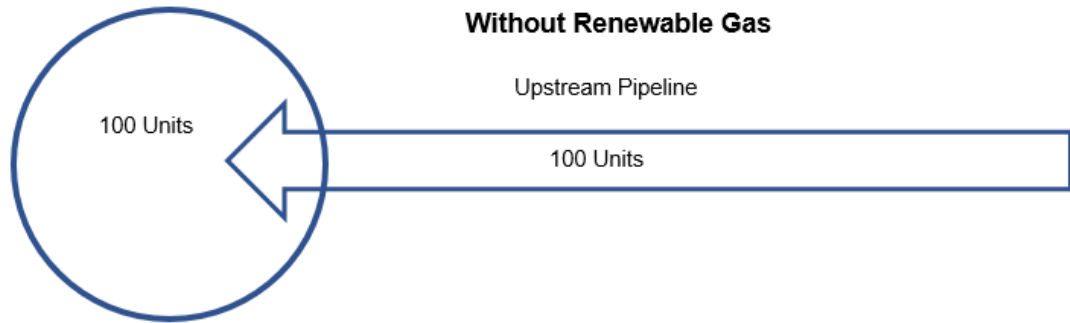


Table 1 below illustrates: 1) what VVWRA would be charged as a normal Schedule No. GS-66 customer without injecting renewable gas into Southwest Gas' system, including all applicable charges and balancing account surcharges ("Without Renewable Gas"); and 2) the cost offsets VVWRA would realize upon the injection of renewable gas into Southwest Gas' system ("With Renewable Gas"). Specifically, the section under the heading "With Renewable Gas" illustrates how renewable gas injected into Southwest Gas' system reduces the amount of natural gas Southwest Gas would otherwise purchase and transport on upstream pipelines. Additionally, this section of Table 1 also illustrates the avoided cost rates for storage, upstream pipeline services and gas cost that will not apply to the volumes of renewable gas SoCal Biomethane injects into Southwest Gas' system.

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TABLE 1

Description [1]	Without Renewable Gas			With Renewable Gas [2]					
	Rate	Volume	\$	Rate	Volume	SWG \$	RG Volume	RNG \$	Total \$
Metered / SWG		100			100				
Renewable Gas							(50)		
Margin	\$ 0.29024	100	\$ 29.02	\$ 0.29024	100	\$ 29.02			\$ 29.02
Upstream Intrastate Charges									
Storage	\$ 0.01411	100	\$ 1.41	\$ 0.01411	100	\$ 1.41	(50)	\$ (0.71)	\$ 0.71
Variable	\$ 0.05493	100	\$ 5.49	\$ 0.05493	100	\$ 5.49	(50)	\$ (2.75)	\$ 2.75
Upstream Interstate Reservation	\$ 0.05203	100	\$ 5.20	\$ 0.05203	100	\$ 5.20	(50)	\$ (2.60)	\$ 2.60
Balancing Account Surcharges									
FCAM - Pipeline Component	\$(0.02275)	100	\$ (2.28)	\$(0.02275)	100	\$ (2.28)	(50)	\$ 1.14	\$ (1.14)
FCAM - Margin Component	\$(0.00568)	100	\$ (0.57)	\$(0.00568)	100	\$ (0.57)			\$ (0.57)
ITCAM	\$(0.01312)	100	\$ (1.31)	\$(0.01312)	100	\$ (1.31)	(50)	\$ 0.66	\$ (0.66)
GHGBA	\$ 0.05800	100	\$ 5.80	\$ 0.05800	100	\$ 5.80			\$ 5.80
NERBA	\$ 0.00057	100	\$ 0.06	\$ 0.00057	100	\$ 0.06			\$ 0.06
NGLAPBA	\$ 0.00987	100	\$ 0.99	\$ 0.00987	100	\$ 0.99			\$ 0.99
MHPCBA	\$ 0.00584	100	\$ 0.58	\$ 0.00584	100	\$ 0.58			\$ 0.58
CDMIBA	\$ 0.00338	100	\$ 0.34	\$ 0.00338	100	\$ 0.34			\$ 0.34
Total Charges and Adjustments	\$ 0.15718		\$ 15.72	\$ 0.15718		\$ 15.72		\$ (4.26)	\$ 11.46
CPUC	\$ 0.00577	100	\$ 0.58	\$ 0.00577	100	\$ 0.58			\$ 0.58
PPP	\$ -	100	\$ -	\$ -	100	\$ -			\$ -
October 2020 Gas Cost	\$ 0.20247	100	\$ 20.25	\$ 0.20247	100	\$ 20.25	(50)	\$ (10.12)	\$ 10.12
Total Effective Rate	\$ 0.65566		\$ 65.57	\$ 0.65566		\$ 65.57		\$ (14.38)	\$ 51.18

[1] Southwest Gas rates effective October 1, 2020.

[2] With Renewable Gas less than metered volume customer continues to pay GS-66 rates on metered volume and receives credit for RG on Upstream Charges and Gas Cost.

Through this Advice Letter Southwest Gas seeks authorization to deviate from its Schedule No. GS-66, to exempt VVWRA from the Upstream Interstate and Intrastate Charges and ITCAM charges for the renewable gas injected, upon execution of a contract with VVWRA. Southwest Gas expects the contract to be executed in the first quarter of 2021. The contract will adhere to the requirements of GO 96-B, Industry Rule 7 and once executed the applicable tariff sheets will be submitted for approval.

The deviations requested in this Advice Letter are necessary to further the development and construction renewable gas facilities in Southwest Gas' Southern California service territory.



Advice Letter No. 1148-G
Page 5
October 26, 2020

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 Disposition). Southwest Gas respectfully requests this Advice Letter be made effective on November 25, 2020, which is the thirty (30) days from 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 twenty (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: 702-364-3446

Notice

Southwest Gas believes it is exempt from the notice requirements set forth in General Rule 4.2 in GO 96-B since this Advice Letter 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. 1148-G
Page 6
October 26, 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 distribution 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

Distribution List

Advice Letter No. 1148-G

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
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



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

October 26, 2020

Advice Letter No. 1148-G-A

(U 905 G)

Public Utilities Commission of the State of California

Subject: Request for Deviation from Tariff Rate Schedule No. GS-66

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Request for Deviation from Schedule No. GS-66 – Small Electric Power Generation Gas Service

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Natural Gas Displacement from Upstream Pipeline with addition of Renewable Gas

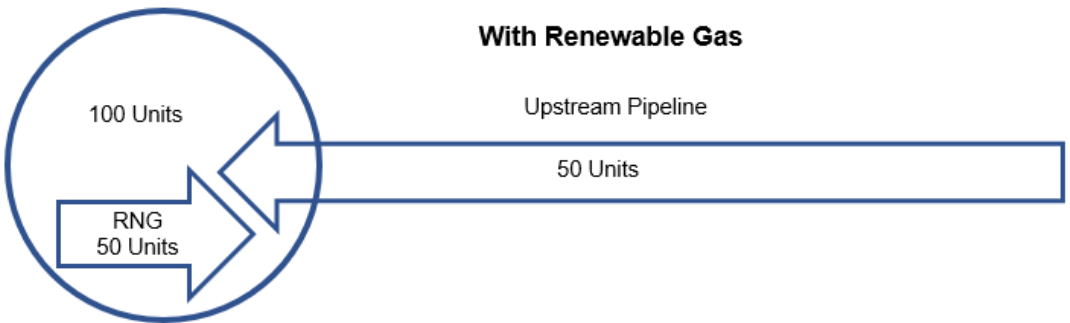
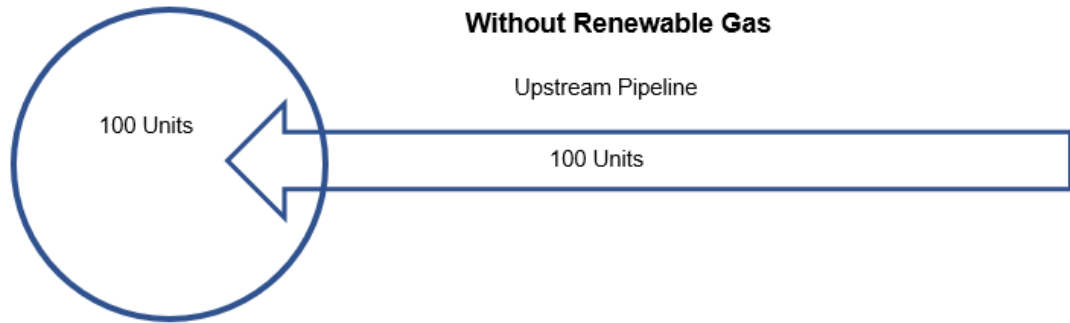


Table 1 below illustrates: 1) what VVWRA would be charged as a normal Schedule No. GS-66 customer without injecting renewable gas into Southwest Gas' system, including all applicable charges and balancing account surcharges ("Without Renewable Gas"); and 2) the cost offsets VVWRA would realize upon the injection of renewable gas into Southwest Gas' system ("With Renewable Gas"). Specifically, the section under the heading "With Renewable Gas" illustrates how renewable gas injected into Southwest Gas' system reduces the amount of natural gas Southwest Gas would otherwise purchase and transport on upstream pipelines. Additionally, this section of Table 1 also illustrates the avoided cost rates for storage, upstream pipeline services and gas cost that will not apply to the volumes of renewable gas SoCal Biomethane injects into Southwest Gas' system.

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TABLE 1

Description [1]	Without Renewable Gas			With Renewable Gas [2]					
	Rate	Volume	\$	Rate	Volume	SWG \$	RG Volume	RNG \$	Total \$
Metered / SWG		100			100				
Renewable Gas							(50)		
Margin	\$ 0.29024	100	\$ 29.02	\$ 0.29024	100	\$ 29.02			\$ 29.02
Upstream Intrastate Charges									
Storage	\$ 0.01411	100	\$ 1.41	\$ 0.01411	100	\$ 1.41	(50)	\$ (0.71)	\$ 0.71
Variable	\$ 0.05493	100	\$ 5.49	\$ 0.05493	100	\$ 5.49	(50)	\$ (2.75)	\$ 2.75
Upstream Interstate Reservation	\$ 0.05203	100	\$ 5.20	\$ 0.05203	100	\$ 5.20	(50)	\$ (2.60)	\$ 2.60
Balancing Account Surcharges									
FCAM - Pipeline Component	\$(0.02275)	100	\$ (2.28)	\$(0.02275)	100	\$ (2.28)	(50)	\$ 1.14	\$ (1.14)
FCAM - Margin Component	\$(0.00568)	100	\$ (0.57)	\$(0.00568)	100	\$ (0.57)			\$ (0.57)
ITCAM	\$(0.01312)	100	\$ (1.31)	\$(0.01312)	100	\$ (1.31)	(50)	\$ 0.66	\$ (0.66)
GHGBA	\$ 0.05800	100	\$ 5.80	\$ 0.05800	100	\$ 5.80			\$ 5.80
NERBA	\$ 0.00057	100	\$ 0.06	\$ 0.00057	100	\$ 0.06			\$ 0.06
NGLAPBA	\$ 0.00987	100	\$ 0.99	\$ 0.00987	100	\$ 0.99			\$ 0.99
MHPCBA	\$ 0.00584	100	\$ 0.58	\$ 0.00584	100	\$ 0.58			\$ 0.58
CDMIBA	\$ 0.00338	100	\$ 0.34	\$ 0.00338	100	\$ 0.34			\$ 0.34
Total Charges and Adjustments	\$ 0.15718		\$ 15.72	\$ 0.15718		\$ 15.72		\$ (4.26)	\$ 11.46
CPUC	\$ 0.00577	100	\$ 0.58	\$ 0.00577	100	\$ 0.58			\$ 0.58
PPP	\$ -	100	\$ -	\$ -	100	\$ -			\$ -
October 2020 Gas Cost	\$ 0.20247	100	\$ 20.25	\$ 0.20247	100	\$ 20.25	(50)	\$ (10.12)	\$ 10.12
Total Effective Rate	\$ 0.65566		\$ 65.57	\$ 0.65566		\$ 65.57		\$ (14.38)	\$ 51.18

[1] Southwest Gas rates effective October 1, 2020.

[2] With Renewable Gas less than metered volume customer continues to pay GS-66 rates on metered volume and receives credit for RG on Upstream Charges and Gas Cost.

Through this Advice Letter Southwest Gas seeks authorization to deviate from its Schedule No. GS-66, to exempt VVWRA from the Upstream Interstate and Intrastate Charges and ITCAM charges for the renewable gas injected, upon execution of a contract with VVWRA. Southwest Gas expects the contract to be executed in the first quarter of 2021. The contract will adhere to the requirements of GO 96-B, Industry Rule 7 and once executed the applicable tariff sheets will be submitted for approval.

The deviations requested in this Advice Letter are necessary to further the development and construction renewable gas facilities in Southwest Gas' Southern California service territory.



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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 Disposition). Southwest Gas respectfully requests this Advice Letter be made effective on November 25, 2020, which is the thirty (30) days from 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 twenty (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: 702-364-3446

Notice

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



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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 distribution 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

Distribution List

Advice Letter No. 1148-G

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
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



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: