

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



Southwest Gas Corporation
GAS (Corp ID 905)
Status of Advice Letter 1167G
As of April 28, 2021

Subject: Revisions to Rule No. 2 - Description of Service and Rule No. 21 - Transportation of Customer-Secured Natural Gas

Division Assigned: Energy

Date Filed: 03-29-2021

Date to Calendar: 04-02-2021

Authorizing Documents: D2009042

Disposition:	Accepted
Effective Date:	04-28-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Valerie 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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



SOUTHWEST GAS CORPORATION

March 29, 2021

Advice Letter No. 1167-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Revision to Rule No. 2 – Description of Service and Rule No. 21 – Transportation of Customer-Secured Natural Gas

Southwest Gas Corporation (Southwest Gas) 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 on Attachment A.

Purpose

The purpose of this submission is to revise Rule No. 2 – Description of Service, to include gas quality specifications that were inadvertently omitted from the tariff when Southwest Gas submitted Advice Letter No. 1147 to replace in its entirety Rule No. 22 – Biomethane Gas with the Standard Renewable Gas Interconnections to the Utility’s Pipeline System adopted in Decision (D.) 20-08-035, as modified by D.20-09-032.

Background

In compliance with D.14-01-034,¹ issued in Rulemaking 13-02-008, Southwest Gas established Rule No. 22 – Biomethane Gas to incorporate the biomethane gas injection requirements and has made subsequent revisions to Rule No. 22 as further decisions warranted.

On August 27, 2020, the Commission approved D.20-08-035,² adopting the Standard Renewable Gas Interconnection Tariff, which Pacific Gas and Electric Company, Southern California Gas Company, San Diego Gas & Electric Company and Southwest Gas (Joint Utilities) jointly filed on November 1, 2019. Pursuant to OP 2 in D.20-08-035, the Joint Utilities were directed to submit a Tier 2 Advice Letter incorporating the Standard Renewable Gas Interconnection Tariff into their respective tariffs. Southwest Gas Advice

¹ *Decision Regarding the Biomethane Implementation Tasks in Assembly Bill 1900*, effective January 16, 2014.

² On September 28, 2020, the Commission issued D.20-09-032 to correct errors in D.20-08-035.



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Letter No. 1147, submitted in compliance with OP 2 was approved by the Energy Division, effective October 28, 2020.

However, although the adopted Rule No. 22, Section K.1, Base Utility Gas Specifications states renewable gas must meet the gas quality specifications of each utility's respective Rules, i.e., Southwest Gas' Section A of Rule No. 2 and Section B of Rule No. 21,³ Southwest Gas inadvertently omitted a revision to Rule No. 2 to incorporate gas quality specifications, as well as to make conforming revisions to Rule No. 21 regarding the same in Advice Letter No. 1147.

Revisions to Rule No. 2 and Rule No. 21

Through this Advice Letter, Southwest Gas seeks to include gas quality specifications in its tariff Rule No. 2 and make conforming changes to its tariff Rule No. 21 that should have been included in its Advice Letter No. 1147. The tariff revisions are provided in both clean and redlined (Attachment B) versions.

Effective Date

Pursuant to OP 2 D.20-08-035, 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. Therefore, Southwest Gas respectfully requests that this Advice Letter be made effective April 28, 2021, which is thirty (30) days after the date of submission.

Protest

Anyone may protest this Advice Letter to the California Public Utilities 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, email or facsimile. 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

³ D.20-08-035, Attachment A, at pg. 21.



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

Mr. Justin Lee Brown
Senior Vice President/General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Email: justin.brown@swgas.com
Facsimile: 702-364-3452

Notice

Southwest Gas believes it is exempt from the notice requirements set forth in General Rule 4.2 of GO 96-B, since this Advice Letter is being submitted in accordance with OP 2 in D.20-08-035.

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 as well as to parties and interest persons on the official service list in R.13-02-008.

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. 1167-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

ATTACHMENT A
Advice Letter No. 1167-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
2nd Revised Sheet No. 163	Rule No. 2 – Description of Service	1st Revised Sheet No. 163
Original Sheet No. 163.1	Rule No. 2 – Description of Service (<i>Continued</i>)	
4th Revised Sheet No. 251	Rule No. 21 – Transportation of Customer-Secured Natural Gas (<i>Continued</i>)	3rd Revised Sheet No. 251

RULE NO. 2

DESCRIPTION OF SERVICE

A. GAS QUALITY AND HEATING VALUE

The Company supplies natural gas, which may include Renewable Gas pursuant to Rule No. 22, Standard Renewable Gas Interconnections to the Utility's Pipeline System, of this California Gas Tariff, and which is altered from the natural state only by the removal of any condensible constituents or of injurious impurities and by the addition of a warning odorant. The heating value of natural gas supplied by the Company will vary from time to time depending upon the fields being drawn upon. The average monthly heating value in British thermal units (Btu) — dry basis — per cubic foot of the natural gas served may be expected to vary within the limits of 970 to 1,150 Btu.

As required by General Order 58-A:

1. Hydrogen Sulfide – No gas supplied by any gas utility for domestic, commercial or industrial purposes in this state shall contain more than one fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet (4 parts per million by volume of hydrogen sulfide).
2. Total Sulfur – No gas supplied by any gas utility for domestic, commercial or industrial purposes shall contain more than five (5) grains of total sulfur per one hundred (100) standard cubic feet (no greater than 85 parts per million by volume of total sulfur).

The gas delivered to the Company must meet the quality specifications required by the upstream pipeline supplier(s) or, absent pipeline supplier(s) gas quality specifications, must meet the following:

1. Gas shall not contain dust, sand, dirt, gums, oils, microbes, bacteria, pathogens and/or other substances at levels that would be injurious to Company facilities or which would present a health and/or safety hazard to Company employees, customers, and/or the public or that would cause Gas to be unmarketable.
2. Gas delivery temperature is not to be below 40 degrees Fahrenheit or above 120 degrees Fahrenheit.
3. Gas shall be interchangeable with the gas in the Company's receiving pipeline. Gas shall have a minimum Wobbe Number of 1280. Gas shall meet American Gas Association's Lifting Index, Flashback Index and Yellow Tip Index interchangeability indices for high methane gas relative to a typical composition of gas in the Company's system serving the area. Acceptable specification ranges are: * Lifting Index (IL); IL <= 1.06; * Flashback Index (IF); IF <= 1.2; * Yellow Tip Index (IY); IY >= 0.8.

RULE NO. 2

DESCRIPTION OF SERVICE

(Continued)

A. GAS QUALITY AND HEATING VALUE *(Continued)*

4. Gas supplied shall not contain greater than 4% of total combined inert compounds, which includes maximum of 0.2% oxygen, 3% nitrogen; 2% carbon dioxide, and any other inert gas by total volume.
5. Gas shall contain no liquids at, or immediately downstream of the receipt point(s).
6. Hydrocarbon Dew Point for Gas is not to exceed 20 degrees Fahrenheit.
7. Gas received into the Company's system shall have a water content of less than 7 pounds per million standard cubic feet.

B. PRESSURES

Gas is supplied by the Company either at standard "low pressure" (4 ounces) or at "high pressure." Low pressure service is available at all points where gas is supplied at all. Where available from existing high pressure mains, at the option of the Company, high pressure service will be supplied. The Company reserves the right to lower the pressure or discontinue the delivery of gas at high pressure.

C. DETERMINATION OF THERMS TO BE BILLED

1. Average Heating Value

The average heating value (Btu per cubic foot) used in billing shall be determined by means of a recording calorimeter, employing the Thomas principle of calorimetry, or by means of some other recognized method which is approved by the Commission. The average total heating value in any billing period shall be the arithmetic average of the total heating values for each day during such period. In the event the Company is unable to utilize its own recording calorimeter, the daily average heating values of the gas delivered by the supplier shall be used.

2. Positive Displacement Metering

The number of therms to be billed will be determined by multiplying the difference in meter reading by an appropriate billing factor.

RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS

(Continued)

A. CHARACTER OF SERVICE (Continued)

4. Gas transported under Schedule Nos. GS-70/GN-70/SLT-70, GS-VIC, and GN-T shall be for use only by the customer, unless the Commission has specifically authorized the customer otherwise to resell such transported gas. Service under the provisions of Schedule No. GN-T shall not constitute the dedication of the Company's pipeline system or any portion thereof to the customer.

B. GAS SPECIFICATIONS

1. Unless otherwise agreed to by both parties, the gas delivered to the Company must meet the quality specifications in Rule No. 2, Description of Service, of this California Gas Tariff.
2. It must also be at the pressure (See Rule No. 2 of this California Gas Tariff) and have the value specified in the customer's transportation service agreement.

C. QUANTITIES OF GAS

1. The Company shall not be obligated to accept customer's gas in excess of amounts it advises customer it can accept. The Company shall not be required to continue to accept gas at any receipt point when the daily flow rate at that receipt point(s) is less than 50 Mcf per day.
2. North American Energy Standards Board timelines will be followed regarding nominating, confirming and scheduling gas receipts and deliveries as they may be revised by the FERC from time to time. The customer shall be responsible for contacting the upstream interstate pipeline(s) to arrange for the nominating and scheduling of receipts and deliveries hereunder, provided; however, that the customer may designate one party to serve as its Agent for such purpose. In the Company's Southern California service area, such contact shall be made to the Company. The Company and upstream interstate pipeline(s) require that specific information be provided to successfully process each nomination. It is the customer's or their Agent's responsibility to satisfy the information requirements.

Nominations Made Directly to the Upstream Interstate Pipeline(s): If the customer nominates directly to the upstream interstate pipeline(s), the customer or Agent must provide their nomination(s) to the Company utilizing a method that is mutually agreeable to both the customer and Southwest Gas prior to the nomination deadlines set forth below:

D
T/N
T/N

T

**ADVICE LETTER NO. 1167-G
ATTACHMENT B**

Rule No 2. – Description of Service
Rule No. 21 – Transportation of Customer-Secured Natural Gas

REDLINED

RULE NO. 2

DESCRIPTION OF SERVICE

A. GAS QUALITY~~KIND~~ AND HEATING VALUE

The Company supplies natural gas, which may include ~~Biomethane~~ Renewable Gas pursuant to Rule No. 22, Biomethane Gas Standard Renewable Gas Interconnections to the Utility's Pipeline System, of this California Gas Tariff, and which is altered from the natural state only by the removal of any condensible constituents or of injurious impurities and by the addition of a warning odorant. The heating value of natural gas supplied by the Company will vary from time to time depending upon the fields being drawn upon. The average monthly heating value in British thermal units (Btu) — dry basis — per cubic foot of the natural gas served may be expected to vary within the limits of 970~~50~~ to 1,150 Btu.

As required by General Order 58-A:

1. Hydrogen Sulfide – No gas supplied by any gas utility for domestic, commercial or industrial purposes in this state shall contain more than one fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet (4 parts per million by volume of hydrogen sulfide).
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The gas delivered to the Company must meet the quality specifications required by the upstream pipeline supplier(s) or, absent pipeline supplier(s) gas quality specifications, must meet the following:

1. Gas shall not contain dust, sand, dirt, gums, oils, microbes, bacteria, pathogens and/or other substances at levels that would be injurious to Company facilities or which would present a health and/or safety hazard to Company employees, customers, and/or the public or that would cause Gas to be unmarketable.
2. Gas delivery temperature is not to be below 40 degrees Fahrenheit or above 120 degrees Fahrenheit.
- 4.3. Gas shall be interchangeable with the gas in the Company's receiving pipeline. Gas shall have a minimum Wobbe Number of 1280. Gas shall meet American Gas Association's Lifting Index, Flashback Index and Yellow Tip Index interchangeability indices for high methane gas relative to a typical composition of gas in the Company's system serving the area. Acceptable specification ranges are: * Lifting Index (IL); IL <= 1.06; * Flashback Index (IF); IF <= 1.2; * Yellow Tip Index (IY); IY >= 0.8.

~~B. PRESSURES~~

~~Gas is supplied by the Company either at standard "low pressure" (4 ounces) or at "high pressure." Low pressure service is available at all points where gas is supplied at all. Where available from existing high pressure mains, at the option of the Company, high pressure service will be supplied. The Company reserves the right to lower the pressure or discontinue the delivery of gas at high pressure.~~

~~C. DETERMINATION OF THERMS TO BE BILLED~~

~~1. Average Heating Value~~

~~The average heating value (Btu per cubic foot) used in billing shall be determined by means of a recording calorimeter, employing the Thomas principle of calorimetry, or by means of some other recognized method which is approved by the Commission. The average total heating value in any billing period shall be the arithmetic average of the total heating values for each day during such period. In the event the Company is unable to utilize its own recording calorimeter, the daily average heating values of the gas delivered by the supplier shall be used.~~

~~2. Positive Displacement Metering~~

~~The number of therms to be billed will be determined by multiplying the difference in meter reading by an appropriate billing factor.~~

RULE NO. 2

DESCRIPTION OF SERVICE
(Continued)

A. GAS QUALITY AND HEATING VALUE (Continued)

4. Gas supplied shall not contain greater than 4% of total combined inert compounds, which includes maximum of 0.2% oxygen, 3% nitrogen; 2% carbon dioxide, and any other inert gas by total volume.
5. Gas shall contain no liquids at, or immediately downstream of the receipt point(s).
6. Hydrocarbon Dew Point for Gas is not to exceed 20 degrees Fahrenheit.
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RULE NO. 21

TRANSPORTATION OF CUSTOMER-SECURED NATURAL GAS

(Continued)

A. CHARACTER OF SERVICE (Continued)

4. Gas transported under Schedule Nos. GS-70/GN-70/SLT-70, GS-VIC, ~~GS-LUZ~~, and GN-T shall be for use only by the customer, unless the Commission has specifically authorized the customer otherwise to resell such transported gas. Service under the provisions of Schedule No. GN-T shall not constitute the dedication of the Company's pipeline system or any portion thereof to the customer.

B. GAS SPECIFICATIONS

1. Unless otherwise agreed to by both parties, the gas delivered to the Company must meet the quality specifications ~~required by the Company's upstream pipeline supplier(s) in Rule No. 2, Description of Service, of this California Gas Tariff.~~
2. It must also be at the pressure (See Rule No. 2 of this California Gas Tariff) and have the value specified in the customer's transportation service agreement.

C. QUANTITIES OF GAS

1. The Company shall not be obligated to accept customer's gas in excess of amounts it advises customer it can accept. The Company shall not be required to continue to accept gas at any receipt point when the daily flow rate at that receipt point(s) is less than 50 Mcf per day.
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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	