

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



**Southwest Gas Corporation**  
**GAS (Corp ID 905)**  
**Status of Advice Letter 1166G**  
**As of April 30, 2021**

Subject: Request for Approval of Contract with LUZ Solar Partners LTD., XIII & IX and Tariff Deviation

Division Assigned: Energy

Date Filed: 03-29-2021

Date to Calendar: 04-02-2021

Authorizing Documents: None

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>04-28-2021</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Valerie Ontiveroz

(702) 876-7323

[valerie.ontiveroz@swgas.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**



# **SOUTHWEST GAS CORPORATION**

March 29, 2021

**Advice Letter No. 1166-G**

(U 905 G)

Public Utilities Commission of the State of California

**Subject: Request for Approval of Contract (Special Agreement) with LUZ Solar Partners LTD., VIII & IX**

**Purpose**

Southwest Gas Corporation (Southwest Gas) hereby submits for approval by the California Public Utilities Commission (Commission) the special agreement between Southwest Gas and LUZ Solar Partners LTD., VIII & LUZ Solar Partners LTD., IX (collectively, LUZ), and corresponding revisions to Southwest Gas' California Gas Tariff. The tariff sheet being modified as a result of this submission is included as Attachment A. This Advice Letter is submitted in accordance with General Order (GO) 96-B, Industry Rule 7.

**Background**

LUZ, also known as "SEGS 8" and "SEGS 9", are two solar thermal plants with dual fuel technology, solar and natural gas and rated at 92 megavolt amperes (MVA). LUZ is located in Hinkley, California.

In 1989, Southwest Gas began serving LUZ under a special agreement and a subsequent agreement was executed in 1997. Given that the initial terms of the 1997 agreement expired, Southwest Gas served LUZ on a month-to-month basis under the evergreen terms of the agreement. In Southwest Gas' Test Year (TY) 2014 General Rate Case (GRC) (Application (A.) 12-12-024), the Commission authorized Southwest Gas to establish Schedule No. GS-LUZ – LUZ Solar Partners LTD. Natural Gas Service, which was dedicated to serving LUZ only. Once the new rate schedule was established, Southwest Gas terminated its special agreement with LUZ. Since June 2014, Southwest Gas has been serving LUZ under this rate schedule.

In August 2019, Southwest Gas filed its TY 2021 GRC (A.19-08-015), wherein it requested to eliminate Schedule No. GS-LUZ since it was informed that SEGS 8 and 9 were being decommissioned and LUZ would therefore be leaving Southwest Gas' system in late 2020. However, in late 2020, well after the parties to A.19-08-015 executed and submitted a settlement agreement resolving all issues in that proceeding, LUZ informed Southwest Gas that the SEGS facilities would continue to operate, and that it wished to continue service with Southwest Gas.



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On March 25, 2021, the Commission approved Decision (D.) 21-03-052, the *Decision Granting Joint Motion for Approval of Settlement Between Southwest Gas Corporation, Public Advocates Office and City of Victorville Adopting Test Year 2021 General Rate Increases*. Southwest Gas will submit a separate Advice Letter to implement the tariff revisions and rates authorized in D.21-03-052 effective April 1, 2021, including the elimination of Schedule No. GS-LUZ.

Had Southwest Gas not been informed that LUZ was leaving its system in late 2020, it would have sought to continue the GS-LUZ rate schedule in A. 19-08-015. As such, this special agreement is necessary to provide LUZ with rates substantially similar to those LUZ would be paying if the GS-LUZ schedule were continued.

### **Description of Special Agreement and Confidentiality**

The terms and conditions of the special agreement are detailed in Attachment B to this Advice Letter. However, because those terms and conditions contain market-sensitive information and negotiated terms, the special agreement is considered confidential. Pursuant to GO 66-D, Section 583 of the Public Utilities Code, D.16-08-024 and D.17-09-023, Southwest Gas is providing a confidential version of Attachment B to the Energy Division and the Public Advocates' Office. A declaration requesting confidential treatment for Attachment B is provided with this Advice Letter.

### **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 April 28, 2021, which is thirty (30) days from the date submitted.

### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 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, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)  
Facsimile: 415-703-2200



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

Mr. Justin Lee Brown  
Senior Vice President/General Counsel  
Southwest Gas Corporation  
P.O. Box 98510  
Las Vegas, NV 89193-8510  
Email: [justin.brown@swgas.com](mailto:justin.brown@swgas.com)  
Facsimile: 702-364-3446

### **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.

### **Service**

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is serving 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](mailto:valerie.ontiveroz@swgas.com)

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By:   
Valerie J. Ontiveroz

**Distribution List**

Advice Letter No. 1166-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](mailto:elizabeth.echols@cpuc.ca.gov)

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

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

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

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[robert.pocta@cpuc.ca.gov](mailto:robert.pocta@cpuc.ca.gov)

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

ATTACHMENT A  
Advice Letter No. 1166-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
2nd Revised Sheet No. 145	List of Special Contracts and Deviations	1st Revised Sheet No. 145

LIST OF SPECIAL CONTRACTS AND DEVIATIONS

<u>Name and Location of Customer</u>	<u>Type or Class of Service</u>	<u>Execution Date</u>	<u>Commission Authorization Number and Date</u>	<u>Most Comparable Regular Tariff</u>	
				<u>Schedule No.</u>	<u>Contract Differences</u>
Luz Solar Partners Ltd., Units VIII and IX Harper Lake, California	Generation	03-28-2021	Advice Letter No. 1166	GS-70	Special Agreement

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**ADVICE LETTER NO. 1166-G  
ATTACHMENT B**

Special agreement between Southwest Gas and  
LUZ Solar Partners LTD., VIII & LUZ Solar Partners LTD., IX

**This Attachment is being provided to the Energy Division  
and the Public Advocates Office under the confidentiality  
provisions of General Order 66-D, Cal PU Code § 583  
and D.16-08-024 and D.17-09-023**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**DECLARATION OF VALERIE J. ONTIVEROZ  
REGARDING CONFIDENTIALITY OF CERTAIN DATA**

I, Valerie J. Ontiveroz, do declare as follows:

1. I am the Regulatory Manager/California, designated by Justin Lee Brown, Senior Vice President and General Counsel for Southwest Gas Corporation ("Southwest Gas") to submit this declaration. In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.
2. I have reviewed Attachment B, *Service Agreement for Intrastate Transportation of Natural Gas Under Rate Schedule No. GS-70 Noncore General* to Advice Letter No. 1166
3. I provide this Declaration in accordance with Decision ("D.") 16-08-024 and 17-09-023 to demonstrate that the confidential information ("Protected Information") provided in the subject attachment is within the scope of data protected as confidential under applicable law, and pursuant to Public Utilities ("PUC") Code § 583 and General Order ("GO") 66-D.
4. Specifically, the information included in the above-referenced attachment contains confidential negotiated contract terms and prices that are eligible for confidential treatment pursuant to Government Code § 6254(k) and 6255(a) as the attachment contain commercially sensitive information.
5. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 29<sup>th</sup> day of March, 2021, at Las Vegas, Nevada.

  
\_\_\_\_\_  
Valerie J. Ontiveroz

Regulatory Manager/California



# 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 proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

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

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
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	