

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 28, 2021

**Advice Letter 1170-G/1170-G-A**

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

**SUBJECT: Transition Plan for the Expiration of Emergency Customer Protections  
Pursuant to Resolution M-4849.**

Dear Mr. Brown:

Advice Letter 1170-G/1170-G-A is effective as of May 1, 2021.

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

April 16, 2021

## **Advice Letter No.1170-G-A**

(U 905 G)

Public Utilities Commission of the State of California

**Subject: Transition Plan for the Expiration of Emergency Customer Protections Pursuant to Resolution M-4849**

### **Purpose**

Southwest Gas Corporation (Southwest Gas) hereby submits this partial supplemental Advice Letter to comply with Ordering Paragraph (OP) 5 of Resolution M-4849, *Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections* (Resolution M-4849). There are no tariff sheets associated with this submission.

### **Background**

In July 2019, the Commission issued Decision (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.

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. As a result, and pursuant to OP 2 in D.19-07-015, Southwest Gas submitted Advice Letter 1130 on March 25, 2020 detailing the Emergency Disaster Relief Program (EDRP) customer protections implemented by Southwest Gas in response to COVID-19.

On April 16, 2020, the Commission adopted Resolution M-4842 (Resolution M-4842) ratifying the directives issued in the March 17, 2020 Letter from Executive Director Alice Stebbins implementing EDRP customer protections. Resolution M-4842 recognized 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.”<sup>1</sup>

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<sup>1</sup> Resolution M-4842, at pgs. 3-4.



All residential and small business customers in California are eligible for the emergency customer protections.<sup>2</sup>

Southwest Gas submitted Advice Letter No. 1130-A in compliance with Resolution M-4842 to establish the COVID-19 Pandemic Protections Memorandum Account (CPPMA) and address 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. Advice Letter Nos. 1130-B and 1130-C were subsequently submitted to offer additional clarifications and modify the CPPMA.<sup>3</sup>

On February 11, 2021, the Commission adopted Resolution M-4849 extending the customer protection measures for residential and small business customers adopted in D.19-07-015 and D.19-08-025 through June 30, 2021. Pursuant to OP 2 in Resolution M-4849, Southwest Gas submitted Advice Letter No. 1161 demonstrating compliance with the extension of emergency customer protections to support California customers in Southwest Gas' California service territories.

On February 25, Southwest Gas submitted its Draft Advice Letter to Energy Division staff pursuant to OP 6 in Resolution M-4849, so that it may be reviewed for compliance with the customer protection measures adopted in D.19-07-015 and D.19-08-025, and Resolutions M-4842 and M-4849, and also so that the Energy Division may share the utilities' Advice Letters with the Low Income Oversight Board who may also offer their recommendations. Directives from the Energy Division were subsequently distributed to the Small and Multi-Jurisdictional Utilities (SMJU), including Southwest Gas, on March 22, 2021. The LIOB provided their recommendations on March 24, 2021.

OP 5 in Resolution M-4849 requires electric, gas and water utilities to file transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 1) a timeline of new start and resumed activities, 2) a marketing, education and outreach (ME&O) strategy, 3) an explanation of the activities timeline and ME&O strategy accounts for compliance and safety, and 4) a progress tracking and reporting plan. The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on, to effectively ease customers through a transition off of Emergency Customer Protections.<sup>4</sup>

On April 1, 2021, Southwest Gas submitted Advice Letter No. 1170 in compliance with Resolution M-4849, OP 5.

Southwest Gas is submitting this partial supplement at the request of the Energy Division to address: 1) the timing and incremental budget for Marketing, Education and Outreach efforts; 2) potential Federal relief funds available to assist Southwest Gas customers to pay their natural gas bill; and 3) Compliance and Safety, including arrearage data.

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<sup>2</sup> *Id.*, at pg. 4.

<sup>3</sup> The referenced Advice Letters were approved by the Energy Division on December 16, 2020, effective March 4, 2020.

<sup>4</sup> Resolution M-4849 at pg. 34.



## **MARKETING, EDUCATION AND OUTREACH (ME&O)**

### Timing of ME&O

In Advice Letter No. 1170, Southwest Gas provided the following timeline for “Transition to Business as Usual”:

<b>Date</b>	<b>Activity</b>
July 1, 2021	Re-institute third party collections activity (charged off/closed accounts).
August 1, 2021	<ul style="list-style-type: none"><li>• Re-instate billing late payment charges and re-establishment deposits</li><li>• Southwest Gas will continue through at least December 31, 2021 to waive fees or deposits upon customer request if they advise us that they are COVID impacted.</li></ul>
September 1, 2021	<ul style="list-style-type: none"><li>• Re-instate disconnections for non-payment</li><li>• Southwest Gas will not disconnect a customer, who has informed us they are COVID-19 impacted, through at least December 31, 2021.</li></ul>
October 1, 2021	Begin sending recertification and random income verification request letters to CARE customers.
December 2021	Begin removing customers from the CARE program, who do not complete recertification or income verification requirements

To effectively outreach to its customers regarding the above transition from COVID-19 emergency customer protections, Southwest Gas’ proposed messaging, messaging channels and timing included in Advice Letter No. 1170 are provided below. Southwest Gas has provided additional clarifications in ***bold italics***.

- Messaging ***to all customers*** will reference the end of COVID-19 customer protections as of June 30, 2021, including:
  - Late Payment Charge re-instatement;
  - Re-establishment deposit re-instatement; and
  - Service disconnection re-instatement.
- The following targeted messaging for CARE customers around recertification and income verification requirements will be implemented:
  - September 2021 – begin targeted CARE bill messages; and
  - October 2021 – begin mailing letters to CARE customers requesting recertification and income verification.
- ***Southwest Gas will also target the following customers:***
  - ***Customers with arrears;***
  - ***Customers enrolled in deferred payment arrangements;***
  - ***Medical Baseline customers; and***
  - ***Customers in disadvantaged communities (these communities primarily exist in Southwest Gas’ Southern California service territory).***



- **Outreach** channels and timing include the following, **to be provided in both English and Spanish**:
  - June 2021 – begin general bill messages;
  - June 2021 – post website messaging throughout swgas.com;
  - June 2021 – begin messaging through Opower Energy Savings Portal targeting low income customers; and
  - **Southwest Gas will also perform the following**:
    - **June/July 2021 – email blasts and direct mail, as necessary**
    - **June/July 2021 – social media postings.**

#### ME&O Regarding Federal Relief Funds

Southwest Gas Customer Assistance will continue to refer customers to 2-1-1, which identifies where a caller is located and provides referrals to various agency funding assistance programs, including those that may offer federal funding assistance. Southwest Gas will also include information regarding 2-1-1 on its website at swgas.com.

#### ME&O Incremental Costs/Budgets

Resolution M-4849 states:

If an IOU estimates that it cannot both comply with this Resolution and maintain compliance with existing Decision mandates leveraging only existing authorized budgets, it shall note in its Advice Letter the cost estimate, with details of the incremental new activity, and use the memorandum account to record and track incremental costs associated with transition plan implementation.<sup>5</sup>

Southwest Gas' proposed ME&O plan includes methods that are no cost or low-cost and anticipates using its existing budgets for implementation of its plan. However, to the extent that incremental ME&O costs are incurred, Southwest Gas proposes to track these costs in its COVID-19 Pandemic Protections Memorandum Account.

#### **COMPLIANCE AND SAFETY**

As noted above, Southwest Gas submitted Advice Letter Nos. 1130-A, 1130-B and 1130-C in compliance with Resolution M-4842 to establish the COVID-19 Pandemic Protections Memorandum Account (CPPMA), address new requirements pertaining to EDRP Customer Protections implemented and those not implemented in response to COVID-19, as well as Southwest Gas' COVID-19 Communications and Outreach Plan. These Advice Letters were effective March 4, 2020 and since that time, Southwest Gas has complied with Resolution M-4842 with the ongoing implementation of the following COVID-19 Emergency Customers Protections:

- Moratorium on service disconnects;
- Suppression of late fees;

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<sup>5</sup> Resolution M-4849 at pg. 17.



- Suppression of re-establishment deposits;
- Suspension of CARE program removals for residential customers, as well as suspended recertification and income verification requests for CARE customers;
- Suspension of recertification requests for Medical Baseline Allowance program; and
- Updated bill and disconnect notice language to remove “turn off” and “disconnect”.

In addition, Southwest Gas submitted Advice Letter No. 1161 in compliance with Resolution M-4849 to extend the above protections through June 30, 2021.

Southwest Gas will additionally continue efforts to promote the CARE Program to its low-income customers in order to meet Southwest Gas’ annual CARE Program targets.

Furthermore, Southwest Gas will continue to monitor state and local COVID-19 health orders and governmental directives to ensure the safety of Southwest Gas employees and customers. However, Southwest Gas will consult with the Energy Division, as necessary, should it determine that implementation of certain aspects of this transition plan may be delayed in order to protect its employees and customers.

#### Arrearage Data

Resolution M-4849 directs the small and multi-jurisdictional utilities to report the following for their entire geographic region:

- 1) The number and percent of unique customers who are:**
  - a. More than 90 days in arrears; and**
  - b. Not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan.**

Southwest Gas response (for the period ending February 28, 2021):

- Unique residential customers – 531, or 0.28%, meet the above criteria.
  - \$129,141 in total arrears.
- Unique small business customers – 262, or 2.78%, meet the above criteria.
  - \$255,684 in total arrears

- 2) The number and percent of unique customers who are:**
  - a. More than 90 days in arrears;**
  - b. Not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan; and**
  - c. More than \$250 in total arrears.**

Southwest Gas response (for the period ending February 28, 2021):

- Unique residential customers – 197, or 0.10%, meet the above criteria.
  - \$96,845 in total arrears.
- Unique small business customers – 162, or 1.72%, meet the above criteria.
  - \$242,083 in total arrears.



Advice Letter No. 1170-G-A  
Page 6  
April 16, 2021

### **Effective Date**

Pursuant to OP 5 in Resolution M-4849, this Advice Letter is classified as Tier 2 (effective after Energy Division approval) and is subject to Energy Division disposition pursuant to General Order (GO) 96-B. Therefore, Southwest Gas respectfully requests this Advice Letter be made effective on May 1, 2021, which is the same effective date requested in Advice Letter No. 1170.

### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 20 days after the date of this Advice Letter submission and shall be sent by letter via U.S. Mail, facsimile, or electronically mailed. The address for mailing or delivering a protest to the Commission is:

ATTN: Tariff Unit  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [edtariffunit@cpuc.ca.gov](mailto: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](mailto:justin.brown@swgas.com)  
Facsimile: 702-364-3446

### **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 5 in Resolution M-4849.

### **Service**

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is serving copies of this Advice Letter and related tariff sheet to the utilities and interested parties shown on the attached list. Pursuant to OP 2 in Resolution M-4849, Southwest Gas will also serve this Advice Letter to all individuals on the established service lists in Rulemaking (R.) 18-03-011, Application (A.) 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014.



Advice Letter No. 1170-G-A  
Page 7  
April 16, 2021

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. 1170-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](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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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)



# 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	



# SOUTHWEST GAS CORPORATION

April 1, 2021

## **Advice Letter No.1170-G**

(U 905 G)

Public Utilities Commission of the State of California

**Subject: Transition Plan for the Expiration of Emergency Customer Protections Pursuant to Resolution M-4849**

### **Purpose**

Southwest Gas Corporation (Southwest Gas) hereby submits this Tier 2 Advice Letter pursuant to Ordering Paragraph (OP) 5 of Resolution M-4849, *Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections* (Resolution M-4849).

### **Background**

In July 2019, the Commission issued Decision (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.

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. As a result, and pursuant to OP 2 in D.19-07-015, Southwest Gas submitted Advice Letter 1130 on March 25, 2020 detailing the Emergency Disaster Relief Program (EDRP) customer protections implemented by Southwest Gas in response to COVID-19.

On April 16, 2020, the Commission adopted Resolution M-4842 (Resolution M-4842) ratifying the directives issued in the March 17, 2020 Letter from Executive Director Alice Stebbins implementing EDRP customer protections. Resolution M-4842 recognized 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.”<sup>1</sup>

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<sup>1</sup> Resolution M-4842, at pgs. 3-4.



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On February 11, 2021, the Commission adopted Resolution M-4849 extending the customer protection measures for residential and small business customers adopted in D.19-07-015 and D.19-08-025 through June 30, 2021. Pursuant to OP 2 in Resolution M-4849, Southwest Gas submitted Advice Letter 1161 demonstrating compliance with the extension of emergency customer protections to support California customers in Southwest Gas' California service territories.

OP 5 in Resolution M-4849 states:

Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 1) a timeline of new start and resumed activities, 2) a marketing, education and outreach (ME&O) strategy, 3) an explanation of the activities timeline and ME&O strategy accounts for compliance and safety, and 4) a progress tracking and reporting plan. The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on, to effectively ease customers through a transition off of Emergency Customer Protections (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20). Electric and gas corporations shall serve copies of the Advice Letters to R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014 proceeding service lists, and the service list of any new proceeding established to Address Energy Utility Customer Bill Debt Accumulated During the Coronavirus Pandemic. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.

Additionally, on February 25, Southwest Gas submitted its Draft Advice Letter to Energy Division staff pursuant to OP 6 in Resolution M-4849 so that it may be reviewed for compliance with the customer protection measures adopted in D.19-07-015 and D.19-08-025, and Resolutions M-4842 and M-4849, and also so that the Energy Division may share the utilities' Advice Letters with the Low Income Oversight Board who may also offer their

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<sup>2</sup> *Id.*, at pg. 4.

<sup>3</sup> The referenced Advice Letters were approved by the Energy Division on December 16, 2020, effective March 4, 2020.



recommendations. Directives from the Energy Division were subsequently distributed to the Small and Multi-Jurisdictional Utilities (SMJU), including Southwest Gas, on March 22, 2021. The LIOB provided their recommendations on March 24, 2021.

## **Transition Plan**

### **Current COVID-19 Emergency Customer Protections**

Current emergency customer protection activities include:

- Moratorium on service disconnects
- Suppression of late fees
- Suppression of re-establishment deposits
- California Alternate Rates for Energy (CARE)
  - Suspended CARE program removals for residential customers, as well as suspended recertification and income verification requests for CARE customers
- Suspended recertification requests for Medical Baseline Allowance program
  - This will remain our process indefinitely
- Updated bill and disconnect notice language to remove “turn off” and “disconnect”

### **Customer Support Through the Pandemic**

COVID-19 Customer Assistance Queue – Southwest Gas customers impacted by COVID-19 may navigate through our automated phone system to speak to a specialist to discuss account assistance

- To best assist customers, associates received specified training on:
  - Flexible payment options
  - Payment assistance programs
  - Agency referrals

Customers will always be able to speak to a trained representative to provide these services, regardless of timeframe.

Post-Call Survey – Southwest Gas customers can opt into a survey after speaking with a representative to provide feedback on their experience

- Survey question asking, “Have you or someone in your household been impacted by COVID-19 and would you like additional information on resources available?”
- Customers who positively respond receive information on flexible payment options, payment assistance programs and agency referrals

Outbound Payment Assistance program – Southwest Gas places outbound calls to customers who are identified as being in arrears and have not called in to speak to a Customer Solutions representative

- Staffed program with COVID-19 Assist Queue representatives
- To date, outbound calls were placed to over 3,000 California customers, with the following results:



- ~1,000 customers were successfully contacted
- ~130 customers were enrolled in CARE
- ~250 customers were provided agency referrals
- ~300 customers were provided flexible payment options

Agency Payments - Southwest Gas works with California agencies launching the multiple channels for assistance and tracking of impacted customers

- To date, Southwest Gas received over \$400,000 in payments assisting ~1,100 customers

### **Post-EDRP Transition to Business as Usual**

Southwest Gas plans to ease customers back into standard business practices starting with our recent initiative of placing customers who are more than 60 days past due and are more than \$20 in arrears on an automated Deferred Payment Arrangement (DPA) for 8 months. This will help customers bring their accounts current over an extended period.

- July 1, 2021
  - Re-institute third party collections activity (charged off/closed accounts).
- August 1, 2021
  - Re-instate billing late payment charges and re-establishment deposits
  - Southwest Gas will continue through at least December 31, 2021 to waive fees or deposits upon customer request if they advise us that they are COVID impacted.
- September 1, 2021
  - Re-instate disconnects for non-payment
  - Southwest Gas will not disconnect a customer, who has informed us they are COVID-19 impacted, through at least December 31, 2021.
- October 1, 2021
  - Begin sending recertification and random income verification request letters to CARE customers.
- December 2021
  - Begin removing customers from the CARE program, who do not complete recertification or income verification requirements

### **Customer Notifications**

As Southwest Gas begins the gradual transition from emergency customer protections, customers will be notified through multiple channels.

- Messaging will reference the end of COVID-19 customer protections as of June 30, 2021, including:
  - Late Payment Charge re-instatement
  - Re-establishment deposit re-instatement
  - Service disconnection re-instatement
- Channels and timing include:
  - General bill messages beginning in June 2021





- Website messaging throughout swgas.com beginning in June 2021
- Opower Energy Savings Portal messaging targeted to low income customers beginning in June 2021
- In addition, the following targeted messaging for CARE customers around recertification and income verification requirements will be implemented:
  - Targeted CARE bill messages beginning September 2021
  - Letters requesting CARE recertification and income verification will be mailed beginning in October 2021

### **Customer Reporting and Tracking**

Southwest Gas currently tracks customers reporting COVID-19 impacts and automated deferred payment arrangements, and we will continue providing monthly reporting to the Energy Division for:

- COVID-19 Related Changes in Sales, Uncollectibles, Aging Receivables and Bad Debt
- CARE Reporting

### **Energy Division Directives for the SMJUs**

On March 22, 2021, Energy Division provided their feedback on the SMJUs' transition plans and directed *all*<sup>4</sup> SMJUs to incorporate the following items in order to clearly meet the intent of Resolution M-4849:

- Report number of customers that participate in a payment plan that are 6-months or longer.
- If applicable, please discuss data exchange of low-income customers with water utilities, as directed in Resolution M-4849.
- Discuss leveraging community-based organizations (CBOs) and/or LIHEAP service providers for outreach

#### **Report Number of Customers that Participate in a Payment Plan**

Southwest Gas will track and report the number of customers on DPAs. Southwest Gas requests to include this information in its monthly COVID-19 report described above and will begin reporting this data with its report due in April 2021.

#### **Data Exchange of Low-Income Customers with Water Utilities**

Southwest Gas currently exchanges CARE participant data twice a year with two water utilities, Golden State Water Company (Golden State) and Liberty Utilities (Apple Valley Ranchos Water) Corporation (Liberty), both of which have service territories that overlap with Southwest Gas. Resolution M-4849 indicated that the "IOUs should consider ... increasing the frequency with which energy and water IOUs exchange data on accounts enrolled in

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<sup>4</sup> The Energy Division did not have specific directives for Southwest Gas transition plan.



income-eligible programs so that eligible customers can be targeted for enrollment.” As stated in its comments filed on December 23, 2020 in Rulemaking 17-06-024,<sup>5</sup> Southwest Gas would face significant challenges in implementing the recommendation to perform more frequent data exchanges and modifications to the data share process between energy and water utilities. While this may be feasible for some of the larger energy investor owned energy utilities (IOUs), Southwest Gas’ California service territories, customer base, and low-income assistance program budgets are significantly smaller than those of the large IOUs. Therefore, Southwest Gas seeks to maintain its existing amount of data shares.

#### Leveraging CBOs and/or LIHEAP Service Providers for Outreach

Southwest Gas will notify its CBOs, including contractors for Southwest Gas’ Energy Savings Assistance Program, Energy Share agencies, and non-profit organizations that provide service within its California service territories, of the expiration of COVID-19 emergency customer protections and Southwest Gas’ transition plan, so that these CBOs can assist with educating and addressing questions from Southwest Gas customers. Southwest Gas will also work with Community Action Partnership of San Bernardino County, El Dorado County Human Services Department, and Project GO, Inc., who administer LIHEAP throughout Southwest Gas’ California service territories. To support these efforts, Southwest Gas will provide its CBOs and local LIHEAP agencies with materials that can be distributed to customers on its behalf.

#### **LIOB Recommendations**

On March 24, 2021, the LIOB provided its recommendations on the utilities’ transition plans. Although most of the recommendations were directed to the Commission, Southwest Gas is able to incorporate the following recommendation, in part, in its transition plan:

The LIOB recommends that all transition plans include a 7-day or 168 hour-look-ahead period, where if temperatures are forecasted to be above 100 degrees or below 32 degrees, the household shall not be disconnected. The LIOB requests this to be in effect through December 31, 2021.

Southwest Gas currently does not disconnect customers if the weather is expected to be below 15 degrees the following day. However, based on LIOB’s recommendation, Southwest Gas will adjust the temperature threshold to 32 degrees through December 31, 2021. Southwest Gas believes that its current process of evaluating the weather on a daily basis is more appropriate than a 7-day look-ahead period and recommends to continue this process.

#### **Effective Date**

Pursuant to OP 5 in Resolution M-4849, this Advice Letter is classified as Tier 2 (effective after Energy Division approval) and is subject to Energy Division disposition pursuant to

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<sup>5</sup> *Comments ff Southwest Gas Corporation (U 905 G) in Response to Administrative Law Judge’s Ruling Directing the Parties to File and Serve Comments on Water Division Staff Report, December 23, 2020, = at pgs. 2-3*



Advice Letter No. 1170-G  
Page 7  
April 1, 2021

General Order (GO) 96-B. Therefore, Southwest Gas respectfully requests this Advice Letter be made effective on May 1, 2021, which is thirty (30) days after the date of submission.

### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 20 days after the date of this Advice Letter submission and shall be sent by letter via U.S. Mail, facsimile, or electronically mailed. The address for mailing or delivering a protest to the Commission is:

ATTN: Tariff Unit  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [edtariffunit@cpuc.ca.gov](mailto: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](mailto: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 5 in Resolution M-4849.

### **Service**

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is serving copies of this Advice Letter and related tariff sheet to the utilities and interested parties shown on the attached list. Pursuant to OP 2 in Resolution M-4849, Southwest Gas will also serve this Advice Letter to all individuals on the established service lists in Rulemaking (R.) 18-03-011, Application (A.) 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014.

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Advice Letter No. 1170-G  
Page 8  
April 1, 2021

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

Attachments

## **Distribution List**

Advice Letter No. 1170-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)

Robert M. Pocta  
Public Advocates Office  
California Public Utilities Commission  
[robert.pocta@cpuc.ca.gov](mailto:robert.pocta@cpuc.ca.gov)

Nathaniel Skinner  
Public Advocates Office  
California Public Utilities Commission  
[nathaniel.skinner@cpuc.ca.gov](mailto:nathaniel.skinner@cpuc.ca.gov)

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