

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 18, 2022

Advice Letter 1199-G & 1199-G-A

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

**SUBJECT: Update on Southwest Gas' Energy Savings Assistance Program 2020
Statutory Goal Pursuant to D.21-10-023..**

Dear Mr. Brown:

Advice Letter 1199-G & 1199-G-A is effective as of March 14, 2022.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Skala".

Pete Skala
Interim Deputy Executive Director for Energy and Climate Policy/
Interim Director, Energy Division, CPUC



SOUTHWEST GAS CORPORATION

March 14, 2022

Advice Letter No. 1199-G-A

(U 905 G)

Public Utilities Commission of the State of California

Subject: Supplement – Energy Savings Assistance Program 2020 Statutory Goal Pursuant to Decision (D.) 21-10-023

Purpose

The purpose of this Advice Letter is to supplement and replace in its entirety Southwest Gas Corporation's (Southwest Gas or the Company) Advice Letter 1199-G reporting on Southwest Gas' Energy Savings Assistance (ESA) Program 2020 statutory goal pursuant to Ordering Paragraph (OP) 33 in D.21-10-023 issued in Application (A.) 20-03-014, et al. There are no tariff sheets associated with this submission.

Background

On October 31, 2021, the California Public Utilities Commission (Commission) issued D.21-10-023 which approved Southwest Gas' CARE and ESA programs application for program years 2021-2026 (A.20-05-017). OP 33 of this Decision states:

Southwest Gas Corporation must file a Tier 1 advice letter by December 31, 2021, with an update on its progress towards achieving the 2020 statutory goal and describe whether treatments during the 2021 bridge period and recalculation of eligible population using the Annual California Alternate Rates for Energy Eligibility Report data from the 2018-2019 study helped it achieve the final treatments necessary to meet this goal.¹

In compliance with OP 33, Southwest Gas on December 31, 2021, filed its AL 1199-G providing a recalculation of the eligible population using the Annual California Alternate Rates for Energy Eligibility Report Data from the 2018-2019 study (Athens Study) and an update on the status of 2020 uncompleted household treatments during the 2021 bridge period.

In AL 1199-G, Southwest Gas interpreted the language in D.19-11-005 to mean that the number of homes treated by the Company in 2021 should be considered a new treatment goal for that year. However, after additional review of Commission decisions D.19-11-

¹ D.21-10-023, at pp. 168-169.



005 and D.21-10-023, and consideration of Southwest Gas' unique position vis-à-vis the other small and multijurisdictional utilities (SMJU),² Southwest Gas believes its initial interpretation as reflected in AL 1199-G did not align with the spirit of D.19-11-005 to treat and count toward the 2020 statutory goal all eligible and willing participants as of December 31, 2020 under the ESA program.

The Commission clearly states at page 7 of D.19-11-005:

As the Commission expects the SMJUs to meet the existing statutory target of providing all eligible and willing customers the opportunity to participate in low-income energy efficiency programs by 2020, we do not anticipate that the ESA Program will look the same beyond 2020.

Southwest Gas believes that, although it was not able to treat all eligible and willing customers by the end of 2020, the Commission's intent was that customers the Company was able to treat in 2021 should have been counted toward meeting its 2020 ESA statutory goal.

Further, language at pages 8 and 9 of D.19-11-005 did not establish new statutory goals for homes to be treated in 2021 but merely set forth parameters for the SMJU to be authorized additional funds for the bridge period. In other words, to be authorized additional funds for 2021, beyond unspent funds from the previous program cycle, the SMJU had to demonstrate those additional funds were needed to treat additional homes, i.e., progress milestones.

The other SMJU had sufficient unspent funds remaining to support their existing ESA programs through 2021 without requesting additional bridge funding. Additionally, the other SMJU met their 2020 statutory goals prior to the 2021 bridge funding period.

However, Southwest Gas did not meet its 2020 statutory goal and did not have sufficient unspent funds to continue its program throughout 2021 without additional bridge funding. As a result, Southwest Gas needed to establish progress milestones and successfully achieve those milestones to receive additional bridge funding necessary to achieve the Commission's goal of providing all eligible and willing customers the opportunity to participate in the ESA program.

Therefore, Southwest Gas now believes it should have counted first time home treatments completed in 2021 as progress toward meeting its 2020 goal, and that its initial interpretation set forth in AL 1199-G was not in keeping with the spirit of D.19-11-005. Southwest Gas treated a total of 2,641 homes in 2021, of which 2,570 were first time

² The SMJU are Bear Valley Electric Service, PacifiCorp, Liberty Utilities, Alpine Natural Gas and West Coast Gas Company (although West Coast does not offer the ESA program).



treatments and only 71 were go-backs. The 2,570 first time treatments are sufficient for Southwest Gas to meet its 2020 ESA statutory goal, and the total number of homes treated in 2021 exceeded the Company’s progress milestones supporting its need for additional bridge funding pursuant to the requirements of D.19-11-005.

Recalculation of Progress Toward Southwest Gas’ 2020 ESA Program Statutory Goal Using First Time Treatments During the 2021 Bridge Period

OP 33 directs Southwest Gas to recalculate its eligible population using the data from the Athens Study. Using the Athens Study 2018-2019 data, as directed by OP 33 of D.21-10-023_and applying the total number of first-time homes treated in 2021 as progress toward meeting its 2020 ESA program statutory goal shows that Southwest Gas successfully met its 2020 statutory goal for homes treated as reflected in Table 1 below.

**Table 1
Southwest Gas’ Recalculated Estimated Eligible and Treated Households by December 31, 2020**

Description	Calculation	Amount
Southwest Gas’ Technical Eligible Customers [1]	[A]	170,389
Estimated Eligible [2]	$[A] \times 0.3554\% = [B]$	60,556
Estimated Unwilling (40%) [3]	$[B] \times 0.40 = [C]$	24,222
Estimated Eligible and Willing (60%) [3]	$[B] - [C] = [D]$	36,334
Number of Homes treated from 2002-2020	[E]	34,318
Estimated Untreated Homes	$[D] - [E] = [F]$	2,016
First-Time Homes Treated in 2021	[G]	2,570
Homes Treated Beyond Statutory Goal	$[G] - [F] = [H]$	554

[1] Southwest Gas customers that are technically eligible for the ESA Program are individually metered and sub-metered households, plus master-metered only. This estimated population is from the Athens Study.

[2] ESA eligibility ratio of 35.54% from the Athens Study.

[3] Southwest Gas used the 60% willingness and feasibility to participate factor as authorized in D.18-08-020.

Based on the successful use of funds authorized by the Commission during the 2021 bridge funding period, Southwest Gas was able to exceed its 2020 Statutory Goal based on Athens Study data of 34,318 homes treated by 554 homes.

Effective Date

Pursuant to OP 33 in D.21-10-023, Southwest Gas has classified this Advice Letter as Tier 1 (Effective Pending Disposition) pursuant to General Order (GO) 96-B. Southwest Gas respectfully requests this Advice Letter become effective on March 14, 2022, which is the date of submission.



Advice Letter No. 1199-G-A
Page 4
March 14, 2022

Protest

Anyone may protest this Advice Letter to the Commission's Energy Division. The protest must state the grounds upon which it is based with specificity and must be sent no later than 20 days after the date of this Advice Letter submission. Protests are to be submitted electronically to the Commission's Energy Division at:

Email: edtariffunit@cpuc.ca.gov

In addition, protests and all other correspondence regarding this Advice Letter should be sent electronically to:

Ms. Valerie J. Ontiveroz
Regulatory Manager/California
Email: valerie.ontiveroz@swgas.com

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 33 in D.21-10-023 and it will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule.

Service

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is serving copies of this Advice Letter to the utilities and interested parties shown on the attached distribution list and to the official service list in A.20-05-017.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachments

Distribution List

Advice Letter No. 1199-G-A

In conformance with GO 96-B, General Rule 4.3

The following individuals or entities have been served by electronic mail:

Matt Baker, Director
Public Advocates Office
matt.baker@cpuc.ca.gov

Pacific Gas & Electric Company
PGETariffs@pge.com

Southern California Gas Company
GLenart@socalgas.com
Tariffs@socalgas.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



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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

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

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

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

ENERGY Advice Letter Keywords

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



SOUTHWEST GAS CORPORATION

January 27, 2022

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. 1199-G – Substitute Sheet Submission

Southwest Gas Corporation (Southwest Gas) herewith submits substitute sheets regarding Advice Letter No. 1199, which was submitted on December 30, 2021 in compliance with Decision 21-10-023 to provide an update on Southwest Gas' Energy Savings Assistance Program 2020 statutory goal.

The purpose of this substitute sheet submission is to correct the Advice Letter numbering from 1099-G to 1199-G included on all pages of the Advice Letter (page 1 and the headers on pages 2 through 5). The Advice Letter Distribution Sheet and the Advice Letter Summary correctly signify Advice Letter No. 1199-G.

Southwest Gas respectfully requests that the enclosed Advice Letter pages replace the originally submitted Advice Letter No. 1199. No other components of Advice Letter No. 1199 were modified because of this submission.

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



SOUTHWEST GAS CORPORATION

December 30, 2021

Advice Letter No. 1199-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Update on Southwest Gas' Energy Savings Assistance Program 2020 Statutory Goal Pursuant to Decision 21-10-023

Purpose

The purpose of this Advice Letter is to provide an update on Southwest Gas Corporation's (Southwest Gas) 2020 Energy Savings Assistance (ESA) Program 2020 statutory goal pursuant to Ordering Paragraph (OP) 33 in Decision (D.) 21-10-023 issued in Application (A.) 20-03-014, et al., the small and multijurisdictional utilities' (SMJUs) California Alternate Rates for Energy (CARE) and Energy Savings Assistance (ESA) program applications for program years 2021-2026.¹ There are no tariff sheets associated with this submission.

Background

On October 21, 2021, the California Public Utilities Commission (Commission) issued D.21-10-023 which approved Southwest Gas' CARE and ESA programs application for program years 2021-2026 (A.20-05-017). OP 33 of this Decision states:

Southwest Gas Corporation must file a Tier 1 advice letter by December 31, 2021, with an update on its progress towards achieving the 2020 statutory goal and describe whether treatments during the 2021 bridge period and recalculation of eligible population using the Annual California Alternate Rates for Energy Eligibility Report data from the 2018-2019 study helped it achieve the final treatments necessary to meet this goal.²

In compliance with OP 33, Southwest Gas provides a recalculation of the eligible population using the Annual California Alternate Rates for Energy Eligibility Report Data from the 2018-2019 study (Athens Study) and a status of 2020 uncompleted household treatments during the 2021 bridge period.

¹ A.20-05-017 - Application of Southwest Gas Corporation (U905G) for Approval of Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2021-2026, filed on May 29, 2020.

² D.21-10-023, at pp. 168-169.



Recalculation of Southwest Gas’ 2020 ESA Program Statutory Goal and Treatments During the 2021 Bridge Period

New Estimates of 2020 ESA Program Statutory Goal and 2020 Untreated Homes

In Southwest Gas’ *Low-Income Assistance Program 2020 Annual Report*, the Company reported that it treated 34,318 homes through its ESA Program as of December 31, 2020³ falling short of its 2020 treatment goal of 36,949 by 2,631 homes. Southwest Gas calculated its December 31, 2020 statutory household treatment goal of 36,949 homes using the most recent American Community Survey from the Census Bureau. This calculation is reflected in Table 1 below.

**Table 1
Southwest Gas’ Estimated Eligible and Treated Households by December 31, 2020**

Description	Calculation	Amount
Estimated Eligible at year-end 2020 [1]	[A]	61,581
Estimated Unwilling (40%) [2]	[A] x 0.40 = [B]	24,632
Estimated Eligible and Willing (60%) [2]	[A] – [B] = [C]	36,949
Number of Homes Treated from 2002 - 2020	[D]	34,318
Estimated Untreated Homes	[C] – [D] = [E]	2,631

[1] Southwest Gas increased its amount eligible by 1.198% annually as proposed in A.15-02-001.

[2] Southwest Gas used the 60% willingness and feasibility to participate factor as authorized in D.18-08-020.

As noted above, OP 33 directs Southwest Gas to recalculate its eligible population using the data from the Athens Study. Athens is a third-party entity that provides the California energy utilities with comprehensive CARE and ESA program eligibility estimates. The SMJUs received their first CARE and ESA eligibility estimates from Athens for the years 2018-2019. The next Athens eligibility estimates will be available in early 2022, which will contain refreshed estimates that are more aligned with current economic conditions and reflect Southwest Gas’ current technically eligible population.⁴

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³ Southwest Gas’ Low-Income Assistance Programs 2020 Annual Report dated May 3, 2021. A copy of the report may be found here:

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M382/K851/382851955.PDF>.

⁴ D.21-10-023, OP 45 directs the SMJUs to submit refreshed Athens eligibility results to the Commission and relevant service lists by March 12, 2022 (2022 annual report).



Using the Athens Study 2018-2019 data, Southwest Gas recalculated its 2020 household treatment goal of 36,334, resulting in a new estimate of 2,016 untreated homes (a decrease of 615 homes). Table 2 below reflects the recalculation of Southwest Gas' ESA Program 2020 statutory goal using the Athens Study.

Table 2
Southwest Gas' Recalculated Estimated Eligible and Treated Households by December 31, 2020

Description	Calculation	Amount
Southwest Gas' Technical Eligible Customers [1]	[A]	170,389
Estimated Eligible [2]	$[A] \times 0.3554\% = [B]$	60,556
Estimated Unwilling (40%) [3]	$[B] \times 0.40 = [C]$	24,222
Estimated Eligible and Willing (60%) [3]	$[B] - [C] = [D]$	36,334
Number of Homes treated from 2002-2020	[E]	34,318
Estimated Untreated Homes	$[D] - [E] = [F]$	2,016

[1] Southwest Gas customers that are technically eligible for the ESA Program are individually metered and sub-metered households, plus master-metered only. This estimated population is from the Athens Study.

[2] ESA eligibility ratio of 35.54% from the Athens Study.

[3] Southwest Gas used the 60% willingness and feasibility to participate factor as authorized in D.18-08-020.

Household Treatments During 2021 Bridge Period

Southwest Gas' Advice Letter No. 1160-A established its ESA Program 2021 bridge period treatment goal of 2,116 households.⁵ By November 30, 2021, Southwest Gas met this goal. Southwest Gas then began treating 2020 untreated homes and expects to complete an additional 434 homes by December 31, 2021.

Net Completion of 2020 Untreated Homes

Based on Southwest Gas' recalculation of its 2020 household treatment goal, its number of untreated homes has dropped from 2,631 to 2,016. Further, including the anticipated completion of 434 treatments during the 2021 bridge period, Southwest Gas' 2020 estimate of untreated homes has been reduced to 1,582.

⁵ Advice Letter No. 1160-G-A, at 4. Per D.19-11-005, given that Southwest Gas' A.20-05-017 was not approved by May 16, 2021, its January 1, 2021 through June 30, 2021 bridge period household treatment goal of 1,058 was again used for the July 1, 2021 through December 31, 2021 period.



Advice Letter No. 1199-G
Page 4
December 30, 2021

Effective Date

Pursuant to OP 33 in D.21-10-023, Southwest Gas has classified this Advice Letter as Tier 1 (Effective Pending Disposition) pursuant to General Order (GO) 96-B. Southwest Gas respectfully requests this Advice Letter become effective on December 30, 2021, which is 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, 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:

Ms. Valerie J. Ontiveroz
Regulatory Manager/California
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Email: valerie.ontiveroz@swgas.com
Facsimile: 702-364-3446

Please also direct all other communications regarding this Advice Letter to the above-named individual.

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 33 in D.21-10-023 and it will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule.



Advice Letter No. 1199-G
Page 5
December 30, 2021

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 and to the official service list in A.20-05-017.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachments

Distribution List

Advice Letter No. 1199-G

In conformance with GO 96-B, General Rule 4.3

The following individuals or entities have been served by electronic mail:

Amy Yip-Kikugawa, Acting Director
Public Advocates Office
amy.yip-kikugawa@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



SOUTHWEST GAS CORPORATION

December 30, 2021

Advice Letter No. 1099-G

(U 905 G)

Public Utilities Commission of the State of California

**Subject: Update on Southwest Gas' Energy Savings Assistance Program 2020
Statutory Goal Pursuant to Decision 21-10-023**

Purpose

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Southwest Gas Corporation must file a Tier 1 advice letter by December 31, 2021, with an update on its progress towards achieving the 2020 statutory goal and describe whether treatments during the 2021 bridge period and recalculation of eligible population using the Annual California Alternate Rates for Energy Eligibility Report data from the 2018-2019 study helped it achieve the final treatments necessary to meet this goal.²

In compliance with OP 33, Southwest Gas provides a recalculation of the eligible population using the Annual California Alternate Rates for Energy Eligibility Report Data from the 2018-2019 study (Athens Study) and a status of 2020 uncompleted household treatments during the 2021 bridge period.

¹ A.20-05-017 - Application of Southwest Gas Corporation (U905G) for Approval of Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2021-2026, filed on May 29, 2020.

² D.21-10-023, at pp. 168-169.



Recalculation of Southwest Gas’ 2020 ESA Program Statutory Goal and Treatments During the 2021 Bridge Period

New Estimates of 2020 ESA Program Statutory Goal and 2020 Untreated Homes

In Southwest Gas’ *Low-Income Assistance Program 2020 Annual Report*, the Company reported that it treated 34,318 homes through its ESA Program as of December 31, 2020³ falling short of its 2020 treatment goal of 36,949 by 2,631 homes. Southwest Gas calculated its December 31, 2020 statutory household treatment goal of 36,949 homes using the most recent American Community Survey from the Census Bureau. This calculation is reflected in Table 1 below.

**Table 1
Southwest Gas’ Estimated Eligible and Treated Households by December 31, 2020**

Description	Calculation	Amount
Estimated Eligible at year-end 2020 [1]	[A]	61,581
Estimated Unwilling (40%) [2]	[A] x 0.40 = [B]	24,632
Estimated Eligible and Willing (60%) [2]	[A] – [B] = [C]	36,949
Number of Homes Treated from 2002 - 2020	[D]	34,318
Estimated Untreated Homes	[C] – [D] = [E]	2,631

[1] Southwest Gas increased its amount eligible by 1.198% annually as proposed in A.15-02-001.

[2] Southwest Gas used the 60% willingness and feasibility to participate factor as authorized in D.18-08-020.

As noted above, OP 33 directs Southwest Gas to recalculate its eligible population using the data from the Athens Study. Athens is a third-party entity that provides the California energy utilities with comprehensive CARE and ESA program eligibility estimates. The SMJUs received their first CARE and ESA eligibility estimates from Athens for the years 2018-2019. The next Athens eligibility estimates will be available in early 2022, which will contain refreshed estimates that are more aligned with current economic conditions and reflect Southwest Gas’ current technically eligible population.⁴

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³ Southwest Gas’ Low-Income Assistance Programs 2020 Annual Report dated May 3, 2021. A copy of the report may be found here:

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⁴ D.21-10-023, OP 45 directs the SMJUs to submit refreshed Athens eligibility results to the Commission and relevant service lists by March 12, 2022 (2022 annual report).



Using the Athens Study 2018-2019 data, Southwest Gas recalculated its 2020 household treatment goal of 36,334, resulting in a new estimate of 2,016 untreated homes (a decrease of 615 homes). Table 2 below reflects the recalculation of Southwest Gas' ESA Program 2020 statutory goal using the Athens Study.

Table 2
Southwest Gas' Recalculated Estimated Eligible and Treated Households by December 31, 2020

Description	Calculation	Amount
Southwest Gas' Technical Eligible Customers [1]	[A]	170,389
Estimated Eligible [2]	$[A] \times 0.3554\% = [B]$	60,556
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[1] Southwest Gas customers that are technically eligible for the ESA Program are individually metered and sub-metered households, plus master-metered only. This estimated population is from the Athens Study.

[2] ESA eligibility ratio of 35.54% from the Athens Study.

[3] Southwest Gas used the 60% willingness and feasibility to participate factor as authorized in D.18-08-020.

Household Treatments During 2021 Bridge Period

Southwest Gas' Advice Letter No. 1160-A established its ESA Program 2021 bridge period treatment goal of 2,116 households.⁵ By November 30, 2021, Southwest Gas met this goal. Southwest Gas then began treating 2020 untreated homes and expects to complete an additional 434 homes by December 31, 2021.

Net Completion of 2020 Untreated Homes

Based on Southwest Gas' recalculation of its 2020 household treatment goal, its number of untreated homes has dropped from 2,631 to 2,016. Further, including the anticipated completion of 434 treatments during the 2021 bridge period, Southwest Gas' 2020 estimate of untreated homes has been reduced to 1,582.

⁵ Advice Letter No. 1160-G-A, at 4. Per D.19-11-005, given that Southwest Gas' A.20-05-017 was not approved by May 16, 2021, its January 1, 2021 through June 30, 2021 bridge period household treatment goal of 1,058 was again used for the July 1, 2021 through December 31, 2021 period.



Advice Letter No. 1099-G
Page 4
December 30, 2021

Effective Date

Pursuant to OP 33 in D.21-10-023, Southwest Gas has classified this Advice Letter as Tier 1 (Effective Pending Disposition) pursuant to General Order (GO) 96-B. Southwest Gas respectfully requests this Advice Letter become effective on December 30, 2021, which is the date of submission.

Protest

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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:

Ms. Valerie J. Ontiveroz
Regulatory Manager/California
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Email: valerie.ontiveroz@swgas.com
Facsimile: 702-364-3446

Please also direct all other communications regarding this Advice Letter to the above-named individual.

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 33 in D.21-10-023 and it will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule.



Advice Letter No. 1099-G
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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 and to the official service list in A.20-05-017.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachments

Distribution List

Advice Letter No. 1199-G

In conformance with GO 96-B, General Rule 4.3

The following individuals or entities have been served by electronic mail:

Amy Yip-Kikugawa, Acting Director
Public Advocates Office
amy.yip-kikugawa@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



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	