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

Southwest Gas Corporation
GAS (Corp ID 905)
Status of Advice Letter 1348G
As of January 29, 2026

Subject: Update to California Affiliate Transaction Rules Compliance Plan

Division Assigned: Energy

Date Filed: 10-06-2025

Date to Calendar: 10-10-2025

Authorizing Documents: D9712088

Authorizing Documents: D9808035

Disposition:	**Accepted**
Effective Date:	**10-06-2025**

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Laurie Brown
702 364-3082
laurie.brown@swgas.com

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

To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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

SOUTHWEST GAS CORPORATION

October 6, 2025

Advice Letter No. 1348-G
(U 905 G)

Public Utilities Commission of the State of California

Subject: Update to California Affiliate Transaction Rules Compliance Plan

Southwest Gas Corporation (Southwest Gas) herewith submits Advice Letter No. 1348. There are no tariff sheets associated with this submission.

Purpose

The purpose of this Advice Letter is to replace Southwest Gas' previously submitted California Affiliate Transaction Rules Compliance Plan (Plan). Southwest Gas is submitting this revised Plan to reflect recent officer and director changes and other non-substantive and clarifying Plan edits to reflect updated business processes. In addition, this revised Plan reflects that on September 5, 2025, Southwest Gas Holdings, Inc. (Holdings), Southwest Gas' parent company, closed a transaction that resulted in the sale of all of its existing shares in Centuri Holdings Inc. (Centuri). Certain Centuri subsidiaries have historically been identified as affiliates of Southwest Gas in its Plan.[1] As a result of the September 5, 2025 transaction, Holdings no longer owns any shares of Centuri's common stock and accordingly, the Centuri subsidiary companies no longer meet the definition of utility affiliates under the Commission's Rules. They have therefore been removed from Southwest Gas' Plan.

Southwest Gas hereby submits its revised Plan in accordance with both Ordering Paragraph (OP) 2 and Section VI.A of Appendix A of Commission Decision (D.) 97-12-088, as modified by D.98-08-035. The attached Plan presents the most current information for Southwest Gas regarding its affiliates and its affiliate transaction rules compliance efforts and supersedes all previously submitted Plans.

Background

The Commission's Rules, adopted by D.97-12-088 and modified by D.98-08-035, govern the relationship between Southwest Gas and its applicable affiliates. The Rules apply to utility transactions with California affiliates engaging in the provision of a product that uses gas or the provision of services that relates to the use of gas, unless otherwise exempted from the Rules.

OP 2 of D.97-12-088 and Section VI.A of the Rules both required affected utilities to submit by advice letter, no later than December 31, 1997, a compliance plan demonstrating that there

[1] As detailed in Attachment "C", the Centuri companies that were deemed affiliates under Southwest Gas' Plan include Centuri Group, Inc.; IntelliChoice Energy, LLC; IntelliChoice Energy of California, LLC; NPL Construction, and Southwest Administrators, Inc. Certain of those companies were Rule II.B affiliates while others were subject to exemptions from the Rules per prior Commission decisions.

are adequate procedures in place that will preclude the sharing of information as prohibited by the Rules. Utilities must submit a revised compliance plan annually using the same advice letter process when there is a change to an existing compliance plan.

Pursuant to D.97-12-088, Southwest Gas developed and submitted with the Commission, in Advice Letter Nos. 562-A and 562-B, a Plan designed to address the interaction between Southwest Gas' public utility operations and its non-exempt affiliates. Subsequent to the submission of Advice Letter No. 562-B, Southwest Gas developed written policies and practices necessary to ensure compliance with each of the subject areas identified in the Rules. These policies and practices are identified as Corporate Policy & Practice (CPP) 1000.01 and Standard Practice (SP) 105.1 and were submitted as amendments to Southwest Gas' Plan in Advice Letter No. 698. Copies of the CPP and SP are attached hereto as Attachments A and B, respectively.[2] A list that includes key information for the Southwest Gas subsidiaries and affiliates that operate in California, share officers or directors with the utility, or for which Southwest Gas has received an exemption from the Rules completes the Plan and is attached as Attachment C.[3]

Southwest Gas believes that the compliance actions set forth in the attached revised Plan are consistent with the Commission's Rules, as delineated in D.97-12-088 and modified by D.98-08-035.

Southwest Gas does not believe there are unusual or unique circumstances that would require affiliate transaction rule measures beyond those already identified by Southwest Gas in its Plan. Therefore, Southwest Gas will apply the provisions of its Plan to any and all transactions between the utility and its non-exempt California affiliates.

Southwest Gas will inform the Energy Division of any material changes in its exempt affiliates and will follow the procedures set forth in Section VI.B of the Rules upon the creation of a California affiliate that is subject to the Rules.

This Advice Letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule.

Effective Date

Southwest Gas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to General Order (GO) 96-B. Southwest Gas respectfully requests that this Advice Letter become effective October 6, 2025, which is the date of submission.

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

[2] Southwest Gas is also providing redline versions of Attachments "A" and "B" with this submission.
[3] Southwest Gas is also providing a redline version of Attachment "C" with this submission.

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:

Catherine M. Mazzeo
Chief Legal, Safety & Compliance Officer
and Corporate Secretary
Email: catherine.mazzeo@swgas.com

Laurie Brown
Regulatory Manager/California
Email: laurie.brown@swgas.com
Copy to: regserve@swgas.com

Notice

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 of 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.

Service

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is serving copies of this Advice Letter to the interested parties shown on the list. In addition, and pursuant to D.97-12-088, and Sections VI.A and VI.B of the Affiliate Transaction Rules, Southwest Gas is serving copies of this Advice Letter to the service list from R.97-04-011/I.97-04-012, provided as Attachment D. This Advice Letter is also available for viewing on Southwest Gas' web site at http://www.swgas.com/en/california-rates-and-regulation.

Respectfully submitted,
SOUTHWEST GAS CORPORATION

By: Laurie Brown

Laurie Brown

Attachments

Distribution List

Advice Letter No. 1348-G

In conformance with GO 96-B, General Rule 4.3

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

Tamera Godfrey
Public Advocates Office
California Public Utilities Commission
tamera.godfrey@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

Michael Campbell
Public Advocates Office
California Public Utilities Commission
Michael.Campbell@cpuc.ca.gov

Nathaniel Skinner
Public Advocates Office
California Public Utilities Commission
nathaniel.skinner@cpuc.ca.gov

Stacey Hunter
Public Advocates Office
California Public Utilities Commission
stacey.hunter@cpuc.ca.gov

Mina Botros, PE
Public Advocates Office
California Public Utilities Commission
Mina.Botros@cpuc.ca.gov

Scott Blaising
blaising@braunlegal.com

Jim Mosher
copperbeechllc@gmail.com

The individuals on the official service list in R.97-04-011/I.97-04-012 were served by email.

Advice Letter No. 1348-G
Attachment A

SOUTHWEST GAS CORPORATION
(U 905 G)
Corporate Policy & Practice (CPP) 1000.01

CPP 1000.01 California Affiliate Transaction Rules Compliance Plan
Effective Date: 10/10/2003
Last Review Date: 05/20/2025

CPP Owner: Regulation

1. This policy has been developed to ensure that Southwest Gas Corporation (the Company) complies with the California Affiliate Transaction Rules (the Rules) issued by the California Public Utilities Commission (CPUC). The Rules govern transactions between public utilities operating within California and their affiliates that are subject to the Rules. Together with the Company's Standard Practice (SP) 105.1, this policy comprises the Company's Compliance Plan.
2. An affiliate is defined by the CPUC as any person, corporation, utility, partnership, Company, or other entity of which five percent or more of its outstanding securities are owned, controlled, or held with power to vote, directly or indirectly, either by the Company or any of its affiliates. Transactions between the Company's California public utility operations and any affiliate engaging in the provision of a product that uses gas or in the provision of services related to the use of gas within California are subject to the Rules pursuant to Rule No. II.B.
3. SP 105.1, California Affiliate Transaction Rules Compliance Plan, is designed to address transactions between the Company's California public utility operations and any Rule II.B. affiliate transacting business in California. SP 105.1 provides responsibilities, detailed methods, a reference to departmental written instructions, and identification of other affected SPs. The Company's Compliance Officer can be contacted if there is any question about an affiliate's status.

   NOTE: The Company has designated the Corporate Compliance Officer of the Corporation as the California Affiliate Transaction Compliance Officer (Compliance Officer), who will coordinate the implementation of this SP in order to ensure compliance with the Rules.
4. **Each manager (equivalent and above)** of the Company is responsible for ensuring that **all employees who transact business with affiliates on behalf of the Company** within his or her area of responsibility be familiar with SP 105.1 and receive a copy of related written policies, procedures, and practices and understand and adhere to them. The **officers of** Rule II.B. affiliates are responsible for implementing procedures within their companies necessary to enforce the Rules. Failure to abide by the Rules as outlined in SP 105.1 will result in disciplinary action, up to and including termination of employment.
5. The Company acknowledges a continuing responsibility to apply the scope of the Rules. If the activities of any of the Company's Rule II.B affiliates change, or if a new affiliate is created, the Company will make the appropriate filing(s) with the CPUC.

* * *

Advice Letter No. 1348-G
Attachment A

SOUTHWEST GAS CORPORATION
(U 905 G)
Corporate Policy & Practice (CPP) 1000.01

REDLINED

CPP 1000.01 California Affiliate Transaction Rules Compliance Plan

Effective Date: 10/10/2003
Last Review Date: 06/15/2023

CPP Owner: ~~Regulatory & Energy Efficiency~~Regulation

1. This policy has been developed to ensure that ~~Southwest Gas Holdings, Inc.,~~ Southwest Gas Corporation~~, and Great Basin Transmission Company~~ (the Company) complies with the California Affiliate Transaction Rules (the Rules) issued by the California Public Utilities Commission (CPUC). The Rules govern transactions between public utilities operating within California and their affiliates that are subject to the Rules. Together with the Company's Standard Practice (SP) 105.1, this policy comprises the Company's Compliance Plan.

2. An affiliate is defined by the CPUC as any person, corporation, utility, partnership, Company, or other entity of which five percent or more of its outstanding securities are owned, controlled, or held with power to vote, directly or indirectly, either by the Company or any of its affiliates. Transactions between the Company's California public utility operations and any affiliate engaging in the provision of a product that uses gas or in the provision of services related to the use of gas within California are subject to the Rules pursuant to Rule No. II.B.

3. SP 105.1, California Affiliate Transaction Rules Compliance Plan, is designed to address transactions between the Company's California public utility operations and any Rule II.B. affiliate transacting business in California. SP 105.1 provides responsibilities, detailed methods, a reference to departmental written instructions, and identification of other affected SPs. The Company's Compliance Officer can be contacted if there is any question about an affiliate's status.

> *NOTE: The Company has designated the Corporate Compliance Officer of the Corporation as the California Affiliate Transaction Compliance Officer (Compliance Officer), who will coordinate the implementation of this SP in order to ensure compliance with the Rules.*

4. **Each manager (equivalent and above)** of the Company is responsible for ensuring that **all employees who transact business with affiliates on behalf of the Company** within his or her area of responsibility be familiar with SP 105.1 and receive a copy of related written policies, procedures, and practices and understand and adhere to them. The **officers of** Rule II.B. affiliates are responsible for implementing procedures within their companies necessary to enforce the Rules. Failure to abide by the Rules as outlined in SP 105.1 will result in disciplinary action, up to and including termination of employment.

5. The Company acknowledges a continuing responsibility to apply the scope of the Rules. If the activities of any of the Company's Rule II.B affiliates change, or if a new affiliate is created, the Company will make the appropriate filing(s) with the CPUC.

* * *

Advice Letter No. 1348-G
Attachment B

SOUTHWEST GAS CORPORATION
(U 905 G)
Standard Practice (SP) 105.1

![SOUTHWEST GAS CORPORATION]

SP 105.1 CALIFORNIA AFFILIATE TRANSACTION RULES COMPLIANCE PLAN

EFFECTIVE DATE: 10/06/2003
REVISION DATE: 05/21/2025
Owner: Regulation

I. PURPOSE AND APPLICATION

This Standard Practice (SP) provides the responsibilities, detailed methods, and identification of other related documents to support and ensure compliance with the requirements within Corporate Policy & Practice (CPP) 1000.01, California Affiliate Transaction Rules Compliance Plan. This SP describes actions that are required under the California Affiliate Transaction Rules (the Rules) issued by the California Public Utilities Commission (CPUC) and references the applicable section of the Rules. This SP is not, however, a substitute for the Rules themselves. This SP together with CPP 1000.01 comprise Southwest Gas Corporation's (the Company) California Affiliate Transaction Rules Compliance Plan (Compliance Plan).

SCOPE

This SP applies to all employees of the Company who transact business with covered affiliates in California on behalf of the Company.

II. IMPLEMENTATION

1. CPP 1000.01 ensures compliance with the Rules. The Rules govern transactions between public utilities operating within California and their affiliates that are subject to the Rules.
2. This SP is designed to address transactions between the Company's California public utility operations and any non-exempt Rule II.B. affiliate in California. In addition, it provides the responsibilities, detailed methods, and identification of other affected SPs. The Company's Compliance Officer can be contacted if there is any question about the status of an affiliate or the application of this SP.

   NOTE: The Company has designated the Corporate Compliance Officer of the Corporation as the California Affiliate Transaction Compliance Officer (Compliance Officer), who will coordinate the implementation of this SP in order to ensure compliance with the Rules.

3. The Company acknowledges a continuing responsibility to apply the scope of the Rules. If activities of the Company's Rule II.B affiliates change, or if a new affiliate is created, the Company will make the appropriate filing with the CPUC.
4. Communication – This SP, CPP 1000.01, and other related SPs are located on the Company's InfoNet Web site for access by employees. If necessary, additional related written policies, procedures, and practices will be provided to officers of the Company's non-exempt Rule II.B affiliates.
5. Rule II.B. Affiliate Transaction Policies and Guidelines – The Compliance Officer will coordinate with affected departments and personnel, as necessary, to ensure the Company's written policies, procedures, and practices comply with the Rules. Specific guidelines will be enacted, as necessary, to comply with the standards for accounting and record-keeping. Written policies and practices will be adopted, as necessary, to comply with the directives concerning the nondiscriminatory sharing and dissemination of information, appropriate shared services, transfer of employees, non-preferential and nondiscriminatory service offerings, discounts, business opportunities, and other activities between Rule II.B. affiliates in California and the California public utility operations of the Company.

III. STATEMENT OF POLICY AND PROCEDURE

NOTE: The following responsibilities will apply to transactions between the Company's California public utility operations and its non-exempt Rule II.B. affiliates in California.

1. <u>All Employees transacting business with affiliates on behalf of the Company</u>

    a. Be familiar with this SP and CPP 1000.01 and adhere to them.
    b. Do not provide preferential treatment to affiliates or customers of affiliates. Apply the Company's tariff uniformly to all market participants. (Rules III.A. and B.3. and 4.)
    c. Limit transactions between the Company and affiliates to those goods and services made generally available by the Company or affiliates to all market participants. (Rule III.B.)
    d. Do not condition or tie the provision of any Company goods or services to the receipt of any goods or services from affiliates. (Rule III.C.)
    e. Do not assign Company customers to any affiliates, whether by default, direct assignment, option, or by any other means, unless such assignment is equally available to all competitors. (Rule III.D.)
    f. Do not solicit business for affiliates or provide any market and/or customer-sensitive information to such affiliates. (Rules III.E, IV.A, IV.B, and IV.E.)
    g. Immediately notify department management if any discount, rebate, or waiver of applicable Company charges for service is provided to affiliates so that the terms and conditions can be properly posted. (Rule III.F.)

h. Do not provide a list of non-Company service providers, which includes or identifies affiliates, to a customer unless a specific request has been received from the customer and the CPUC has approved such a list. Contact the California Regulatory Manager for the most current, approved list. (Rule IV.C.)
i. Do not share nonpublic information the Company receives from nonaffiliated suppliers without first obtaining written permission from the supplier. (Rule IV.D.)
j. Do not share plant, facilities, equipment, services, or information systems with affiliates with the exception of permitted corporate support functions. (Rule V.C.)
k. Report all transfers and joint purchases between the Company and affiliates to department management. No joint natural gas commodity or capacity purchases with affiliates are allowed. (Rules V.D. and H.)
l. Do not use shared corporate support functions to transfer confidential, proprietary, or sensitive information from the Company to affiliates. (Rule V.E.)
m. Ensure that employees of the Company are not also employed by an affiliate, except in the role of permitted corporate support. (Rules V.E. and G.)
n. Do not promote or advertise affiliates associated with the Company. Notify management of affiliates' use of the name or logo of the Company. (Rule V.F.)
o. Execute a California Affiliate Transaction Rules Compliance Plan Work Assignment Agreement, Form 105.1, if temporarily assigned to, permanently hired by, or returning from an affiliate, as outlined in SP 757.1, Personnel Hiring and Transferring. (Rule V.G.)
p. If hired by an affiliate, do not disclose any confidential, proprietary, or sensitive Company information to the affiliate. (Rule V.G.2.d.)

2. <u>Each Manager (equivalent or above) of the Company</u>

a. Ensure employees within your areas of responsibility who are involved with affiliates or matters that impact affiliates are aware of this SP and other related written policies, procedures, and practices.
b. Ensure that employees under your areas of responsibility do not provide preferential treatment to affiliates or customers of affiliates. (Rule III.A.)
c. Immediately notify the Compliance Officer if any discount, rebate, or waiver of applicable Company charges for service(s) is provided to an affiliate. Maintain proper records of all transactions. (Rules III.F.1 -14.)
d. Ensure that employees under your area of responsibility do not provide engineering services (including research and development) to affiliates. (Rule IV.E.)
e. Maintain separate, simultaneous records documenting each transaction between the Company and affiliates. Retain such records for a minimum of three years, consistent with Company document

retention practices and CPUC requirements. Make such records available for review upon 72 hours' notice from the Compliance Officer. (Rule IV.F.)

f. Ensure that employees under your area of responsibility do not share services or information systems with affiliates, except for permitted corporate support functions. (Rule V.C.)
g. Ensure that employees under your area of responsibility do not share plant, facilities, or equipment with affiliates, with the exception of permitted corporate support functions (Rule V.C.)
h. Report all joint non-commodity and non-capacity purchases made by the Company with affiliates to the Controller. No joint purchases of natural gas commodity or capacity are permitted. (Rule V.D.)
i. Report all shared corporate support services to the Controller. (Rule V.E.)
j. Ensure that employees under your area of responsibility that are performing permitted shared corporate services do not transfer confidential, proprietary, or sensitive information about the Company to affiliates, and that permitted shared corporate support services are carried out in accordance with the Rules. (Rule V.E.)
k. Ensure that employees under your area of responsibility do not promote affiliates or conduct any other joint advertising or marketing with affiliates. Report all uses of the Company name and logo by affiliates to the Compliance Officer. (Rule V.F.)
l. Do not jointly employ the same employees as affiliates except as provided for in Rule V.E. (Rule V.G.)

    i. Human Resources will assign the *SWG CA Affiliates Journey for New Hires or Rehires* in the SWGreat! Employee Connect system to each employee temporarily assigned to, permanently hired by, or returning from an affiliate.
    ii. The journey provides Form 105.1 (all four parts) for the employee to review and complete.
    iii. Once the transaction is completed in SWGreat! Employee connect, Human Resources will forward the attached agreement (all four parts) to the Compliance Officer.

m. Notify Human Resources prior to temporarily assigning a Company employee to an affiliate. Do not temporarily assign a Company employee to an affiliate in excess of 30% of such employee’s chargeable time in any calendar year. (Rule V.G.2.e.)
n. Do not temporarily assign any Company employee to an energy marketing affiliate. (Rule V.G.2.e.)
o. Report all transfers of goods and services between the Company and affiliates to the Controller and the Compliance Officer. (Rule V.H.)
p. Ensure that employees under your area of responsibility do not offer new non-tariffed products and services except through affiliates or as otherwise provided. (Rules VII.A, VII.C, and VII.I.)

q. Immediately notify the Compliance Officer of any new non-tariffed products and services and verify CPUC approval has been obtained prior to offering any new non-tariffed products and services to customers. (Rule VII.E.)
r. Immediately notify the Compliance Officer of any sale, lease, assignment, or encumbrance of Company property if Company property is affected in any way as part of a non-tariffed product or service offering by the Company. (Rule VII.G.)

3. <u>Compliance Officer</u>

a. Coordinate the implementation and continuous enforcement of the Rules for the Company and its affiliates.
b. Maintain a current copy of this SP and the Rules.
c. Monitor compliance requirements of CPP 1000.01 and this SP and take appropriate action when warranted.
d. Coordinate with other departments as necessary in making records of transactions between the Company and affiliates available within 72 hours for third-party review. (Rule IV.F.)
e. Upon notification from Human Resources that more than five percent of Company employees are assigned to affiliates at any one time, notify the involved managers and affiliates to halt all assignments in excess of the five percent threshold. (Rule V.G.2.)
f. Upon notification that the Company intends to offer any new non-tariffed product or service, coordinate with Regulation, Internal Audit, the California Regulatory Manager and other departments, as necessary, to ensure compliance with Rules VII.D and VII.E.
g. Notify the California Regulatory Manager if the Company provides a discount, rebate or waiver of applicable charges for service provided to an affiliate. (Rule III.F.)

4. <u>Regulation</u>

a. Exclude all costs associated with affiliate research and development activities from rates to the Company's California customers. (Rule V.F.5.)
b. Exclude all costs associated with required independent compliance audits from rates to the Company's California customers. (Rule VI.C.)
c. Coordinate with other departments, as necessary, to ensure that all tariffed products and services offered by the Company meet the requirements of Rule VII.C.

5. <u>California Regulatory Manager</u>

a. Ensure that proper electronic notification and/or posting is made if the Company provides a discount, rebate or waiver of applicable charges for service provided to an affiliate. (Rule III.F.)

b. If a list of non-Company service providers that includes or identifies affiliates is developed, ensure that CPUC approval is obtained prior to the list being made available to customers. Maintain any lists of non-Company service providers that includes or identifies affiliates that have been approved by the CPUC. (Rule IV.C.2.)
c. Coordinate with Legal Affairs and the Compliance Officer in accordance with SP 110.0, Communications with State Regulatory Commissions, to file a Compliance Plan with the CPUC Energy Division no later than December 31 of each year (or as otherwise required by the Rules) whenever there has been a change in the Company's existing Compliance Plan or a change in the Company's affiliates. (Rule VI.A.)
d. Upon the creation of a new affiliate, ensure posting of the appropriate electronic notice, and coordinate with Legal Affairs and the Compliance Officer to file an advice letter demonstrating how the Rules will be implemented with respect to the new affiliate, no later than 60 days following the creation of the new affiliate. (Rule VI.B.)
e. Coordinate with Human Resources and the Controller, as necessary, when an employee transfers from the Company to a non-exempt Rule II.B. affiliate. Provide associated transfer fee amount to the Controller for invoice preparation. Notify the Compliance Officer of the qualifying employee transfer and associated fee to be paid. (Rule V.G.2.c.) A transfer is defined as an employee who leaves the Company to work at an affiliate, or vice versa. The transfer must take place within sixty (60) days to be subject to this SP.
f. Coordinate with Internal Audit and other departments, as necessary, to ensure that the annual independent audit report is filed with the CPUC no later than May 1 of each year. (Rule VI.C.)
g. Ensure Company compliance with filing and reporting requirements for existing and new non-tariffed products or services. (Rules VII.C, VII.E, and VII.H.)

6. Controller

a. Contract (at shareholder expense) external auditors to perform an annual audit of the Company's compliance with the Rules (Rule VI.C).
b. Maintain Company books and records separate from affiliate books and records and apply all required accounting standards. (Rule V.B.)
c. Record all joint purchases of goods and services made by the Company and affiliates in a manner that clearly identifies the Company and affiliate portions of such purchases and allocate costs according to CPUC guidelines. (Rule V.D.)
d. Prepare invoices for fees associated with permitted, shared corporate support services provided by the Company to affiliates, and ensure accurate pricing. (Rule V.E.)
e. Prepare invoices, with information from Human Resources, for fees associated with direct employee movement, and account for such fees

in accordance with Rule V.G.2.c. Notify the Compliance Officer prior to billing the affiliate. The transfer fee must be collected from the affiliate before the end of the current calendar year in which the annual report is submitted to the Commission that includes notification of an employee transfer.

f. Prepare invoices, with information from Human Resources, for fees associated with the temporary use by affiliates of Company employees, and account for such fees. (Rule V.G.2.e.) Notify the Compliance Officer prior to billing the affiliate.
g. Prepare invoices for goods and services transferred to affiliates by the Company, account for these transfers, and ensure pricing is consistent with the Rules. (Rule V.H.)
h. Record all transfers or sales of goods and services from affiliates to the Company. (Rule V.H.)

7. <u>Human Resources</u>

a. Ensure the requirements and practices of SP 757.1, Personnel Hiring and Transferring, are in compliance with the Rules.
b. Document and report to the Compliance Officer and the Controller permanent or temporary employee movement between the Company and affiliates. Track each temporary assignment to an affiliate. (Rule V.G.2.)
c. If more than five percent of the Company's employees are assigned to affiliates at any one time, immediately notify the Compliance Officer. (Rule V.G.2.)
d. When employees are terminated and immediately hired by affiliates, transferred from the Company to non-exempt Rule II.B. affiliates, or returning to the Company for employment from non-exempt Rule II.B. affiliates, inform the California Regulatory Manager by the end of the calendar year of such employee transfers and ensure a signed copy of Form 105.1 for each employee transfer has been completed. (Rule V.G.2.)
e. Ensure employee movement between the Company and affiliates is in compliance with the Rules. (Rule V.G.2.b.)

8. <u>Energy Solutions and Gas Purchases and Transportation</u>

a. Apply the Company's tariff uniformly to all market participants. (Rules III.B.3 and III.B.4.)
b. Ensure the Company does not condition or tie the provision of any of its services to the receipt of any goods or services from affiliates. (Rule III.C.)
c. Ensure the Company does not solicit business, provide any market and/or customer-sensitive information, or give the appearance that the Company speaks for affiliates. (Rules III.E, IV.A, IV.B, and IV.E.)

d. Ensure the Company does not promote, advertise, or market for or with affiliates. (Rule V.F.1.)
e. Ensure the Company does not represent that affiliates will receive any different treatment than any other market participant. (Rule V.F.2.)
f. Ensure the Company does not provide advertising for affiliates unless it provides similar access to all market participants. (Rule V.F.3.)
g. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)
h. Notify the Compliance Officer of any new non-tariffed product or service prior to offering or providing such product or service (Rule VII.D.)

9. <u>Systems Planning</u>

Ensure the Company does not provide engineering services for affiliates. (Rule IV.E.)

10. <u>Legal Affairs/General Counsel</u>

a. Serve as a repository of data for the Company for the creation of new affiliates and the dissolution of existing affiliates and inform the Compliance Officer of any changes to the Company's affiliates. (Rule VI.A and VI.B.)
b. Ensure the Company and affiliates are separate corporate entities. (Rule V.A.)
c. Ensure the Company and affiliates do not have any common directors or officers, except as may be permitted by the Rules. (Rule V.G.1.)
d. Coordinate with the California Regulatory Manager and the Compliance Officer, as necessary, in accordance with SP 110.0, Communications with State Regulatory Commissions, to file a Compliance Plan with the CPUC Energy Division no later than December 31 of each year (or as otherwise required by the Rules) whenever there has been a change in the Company’s existing Compliance Plan or a change in the Company’s relationship(s) with its affiliates. (Rule VI.A.)
e. Upon the creation of a new affiliate, coordinate with the California Regulatory Manager and the Compliance Officer, as necessary, to file an advice letter demonstrating how the Rules will be implemented with respect to the new affiliate, no later than 60 days following the creation of the affiliate. (Rule VI.B.)
f. Ensure the officers and employees of Company affiliates are available to testify upon request of the CPUC. (Rule VI.D.)

11. <u>Corporate Purchasing</u>

a. Ensure the requirements and practices of SP 190.0, Purchasing Goods, are compliant with the Rules.

b. Ensure the Company provides nonpublic information and data which has been received from unaffiliated suppliers to affiliates or unaffiliated entities only after the Company first obtains written affirmative authorization to do so from the supplier. The Company shall not actively solicit the release of such information exclusively to its affiliates while making an effort to keep such information from other unaffiliated entities. (Rule IV.D.)
c. Maintain Company transactions, contracts, and related bid records with affiliates in accordance with the Rules. (Rules IV.F, and IV.G.)

12. Contract Administration

a. Ensure the requirements and practices of SP 195.0, Procuring Services (Corporate Contract Administration), are compliant with the Rules.
b. Ensure the Company provides nonpublic information and data which has been received from unaffiliated suppliers to affiliates or unaffiliated entities only after the Company first obtains written affirmative authorization to do so from the supplier. The Company shall not actively solicit the release of such information exclusively to its affiliates while making an effort to keep such information from other unaffiliated entities. (Rule IV.D.)
c. Maintain Company transactions, contracts, and related bid records with affiliates in accordance with the Rules. (Rule IV.F, and IV.G.)

13. Internal Audit

a. Ensure periodic audits are performed for non-tariffed products and services in compliance with the Rules. (Rule VII.D.4.) Internal Audit will be informed by the California Regulatory Manager at such time non-tariffed products and services are offered or performed by the Company.
b. Perform testing as directed by the external auditor in support of the annual audit of the Company's compliance with the Rules. Report any areas of non-compliance identified during the annual audit to the Compliance Officer and others, as necessary. Obtain responses from the Compliance Officer and others as necessary regarding how such matters are to be addressed. Monitor progress to ensure timely resolution of issues.

14. Corporate Supply Chain, Fleet and Real Estate & Facilities

Ensure the Company does not share plant, facilities, or equipment with affiliates, except for permitted corporate support functions. (Rule V.C.)

15. Strategy & Corporate Development

    a. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)
    b. Notify the Compliance Officer of any new non-tariffed product or service prior to offering or providing such product or service (Rule VII.D.)

16. Engineering Staff

    a. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)
    b. Notify the Compliance Officer of any new non-tariffed product or service prior to offering or providing such product or service (Rule VII.D.)

KEYWORDS AND DEFINITIONS

1. Affiliate - An affiliate is defined by the CPUC as any person, corporation, utility, partnership, company, or other entity of which five percent or more of its outstanding securities is owned, controlled, or held with the power to vote, directly or indirectly, either by the Company or any of its affiliates.
2. Rule II.B Affiliate - An affiliate that provides a product that uses natural gas or a service that relates to the use of natural gas. Transactions between the Company's California public utility operations and the Company's Rule II.B affiliates transacting business in California are subject to the Rules.
3. Exempt Affiliate - A Rule II.B affiliate for which the CPUC has granted Company an exemption from the applicability of the Rules.

IV. RELATED POLICIES, FORMS AND RESOURCES

Corporate Policy & Practice

1000.01 – California Affiliate Transaction Rules Compliance Plan

Standard Practices

110.0 – Communications with State Regulatory Commissions

190.0 – Purchasing Goods

195.0 – Procuring Services (Corporate Contract Administration)

757.1 – Personnel Hiring and Transferring

Forms

105.1 – California Affiliate Transaction Rules Compliance Plan Work Assignment Agreement (computer-produced **e**-form only)

Other

California Affiliate Transaction Rules

Advice Letter No. 1348-G
Attachment B

SOUTHWEST GAS CORPORATION
(U 905 G)
Standard Practice (SP) 105.1

REDLINED

SP 105.1 CALIFORNIA AFFILIATE TRANSACTION RULES COMPLIANCE PLAN

EFFECTIVE DATE: 10/06/2003
REVISION DATE: XX/XX/XXXX
Owner: ~~Regulation and Energy Efficiency~~Regulation

I. PURPOSE AND APPLICATION

This Standard Practice (SP) provides the responsibilities, detailed methods, and identification of other related documents to support and ensure compliance with the requirements within Corporate Policy & Practice (CPP) 1000.01, California Affiliate Transaction Rules Compliance Plan. This SP describes actions that are required under the California Affiliate Transaction Rules (the Rules) issued by the California Public Utilities Commission (CPUC) and references the applicable section of the Rules. This SP is not, however, a substitute for the Rules themselves. This SP together with CPP 1000.01 comprise Southwest Gas Corporation's (the Company) California Affiliate Transaction Rules Compliance Plan (Compliance Plan).

SCOPE

This SP applies to all employees of the Company who transact business with covered affiliates in California on behalf of the Company.

II. IMPLEMENTATION

1. CPP 1000.01 ensures compliance with the Rules. The Rules govern transactions between public utilities operating within California and their affiliates that are subject to the Rules.
2. This SP is designed to address transactions between the Company's California public utility operations and any non-exempt Rule II.B. affiliate in California. In addition, it provides the responsibilities, detailed methods, and identification of other affected SPs. The Company's Compliance Officer can be contacted if there is any question about the status of an affiliate or the application of this SP.

   NOTE: The Company has designated the Corporate Compliance Officer of the Corporation as the California Affiliate Transaction Compliance Officer (Compliance Officer), who will coordinate the implementation of this SP in order to ensure compliance with the Rules.

3. The Company acknowledges a continuing responsibility to apply the scope of the Rules. If activities of the Company's Rule II.B affiliates change, or if a

new affiliate is created, the Company will make the appropriate filing with the CPUC.

4. Communication – This SP, CPP 1000.01, and other related SPs are located on the Company's InfoNet Web site for access by employees. If necessary, additional related written policies, procedures, and practices will be provided to officers of the Company's non-exempt Rule II.B affiliates.
5. Rule II.B. Affiliate Transaction Policies and Guidelines – The Compliance Officer will coordinate with affected departments and personnel, as necessary, to ensure the Company's written policies, procedures, and practices comply with the Rules. Specific guidelines will be enacted, as necessary, to comply with the standards for accounting and record-keeping. Written policies and practices will be adopted, as necessary, to comply with the directives concerning the nondiscriminatory sharing and dissemination of information, appropriate shared services, transfer of employees, non-preferential and nondiscriminatory service offerings, discounts, business opportunities, and other activities between Rule II.B. affiliates in California and the California public utility operations of the Company.

III. STATEMENT OF POLICY AND PROCEDURE

NOTE: The following responsibilities will apply to transactions between the Company's California public utility operations and its non-exempt Rule II.B. affiliates in California.

1. <u>All Employees transacting business with affiliates on behalf of the Company</u>

    a. Be familiar with this SP and CPP 1000.01 and adhere to them.
    b. Do not provide preferential treatment to affiliates or customers of affiliates. Apply the Company's tariff uniformly to all market participants. (Rules III.A. and B.3. and 4.)
    c. Limit transactions between the Company and affiliates to those goods and services made generally available by the Company or affiliates to all market participants. (Rule III.B.)
    d. Do not condition or tie the provision of any Company goods or services to the receipt of any goods or services from affiliates. (Rule III.C.)
    e. Do not assign Company customers to any affiliates, whether by default, direct assignment, option, or by any other means, unless such assignment is equally available to all competitors. (Rule III.D.)
    f. Do not solicit business for affiliates or provide any market and/or customer-sensitive information to such affiliates. (Rules III.E, IV.A, IV.B, and IV.E.)
    g. Immediately notify department management if any discount, rebate, or waiver of applicable Company charges for service is provided to affiliates so that the terms and conditions can be properly posted. (Rule III.F.)
    h. Do not provide a list of non-Company service providers, which includes or identifies affiliates, to a customer unless a specific request has been

received from the customer and the CPUC has approved such a list. Contact the California Regulatory Manager for the most current, approved list. (Rule IV.C.)

i. Do not share nonpublic information the Company receives from nonaffiliated suppliers without first obtaining written permission from the supplier. (Rule IV.D.)
j. Do not share plant, facilities, equipment, services, or information systems with affiliates with the exception of permitted corporate support functions. (Rule V.C.)
k. Report all transfers and joint purchases between the Company and affiliates to department management. No joint natural gas commodity or capacity purchases with affiliates are allowed. (Rules V.D. and H.)
l. Do not use shared corporate support functions to transfer confidential, proprietary, or sensitive information from the Company to affiliates. (Rule V.E.)
m. Ensure that employees of the Company are not also employed by an affiliate, except in the role of permitted corporate support. (Rules V.E. and G.)
n. Do not promote or advertise affiliates ~~association~~ associated with the Company. Notify management of ~~affiliates~~ affiliates' use of the name or logo of the Company. (Rule V.F.)
o. Execute a California Affiliate Transaction Rules Compliance Plan Work Assignment Agreement, Form 105.1, if temporarily assigned to, permanently hired by, or returning from an affiliate, as outlined in SP 757.1, Personnel Hiring and Transferring. (Rule V.G.)
p. If hired by an affiliate, do not disclose any confidential, proprietary, or sensitive Company information to the affiliate. (Rule V.G.2.d.)

2. <u>Each Manager (equivalent or above) of the Company</u>

   a. Ensure employees within your areas of responsibility who are involved with affiliates or matters that impact affiliates are aware of this SP and other related written policies, procedures, and practices.
   b. Ensure that employees under your areas of responsibility do not provide preferential treatment to affiliates or customers of affiliates. (Rule III.A.)
   c. Immediately notify the Compliance Officer if any discount, rebate, or waiver of applicable Company charges for service(s) is provided to an affiliate. Maintain proper records of all transactions. (Rules III.F.1 -14.)
   d. Ensure that employees under your area of responsibility do not provide engineering services (including research and development) to affiliates. (Rule IV.E.)
   e. Maintain separate, simultaneous records documenting each transaction between the Company and affiliates. Retain such records for a minimum of three years, consistent with Company document retention practices and CPUC requirements. Make such records

available for review upon 72 hours' notice from the Compliance Officer. (Rule IV.F.)

f. Ensure that employees under your area of responsibility do not share services or information systems with affiliates, except for permitted corporate support functions. (Rule V.C.)
g. Ensure that employees under your area of responsibility do not share plant, facilities, or equipment with affiliates, with the exception of permitted corporate support functions (Rule V.C.)
h. Report all joint non-commodity and non-capacity purchases made by the Company with affiliates to the Controller. No joint purchases of natural gas commodity or capacity are permitted. (Rule V.D.)
i. Report all shared corporate support services to the Controller. (Rule V.E.)
j. Ensure that employees under your area of responsibility that are performing permitted shared corporate services do not transfer confidential, proprietary, or sensitive information about the Company to affiliates, and that permitted shared corporate support services are carried out in accordance with the Rules. (Rule V.E.)
k. Ensure that employees under your area of responsibility do not promote affiliates or conduct any other joint advertising or marketing with affiliates. Report all uses of the Company name and logo by affiliates to the Compliance Officer. (Rule V.F.)
l. Do not jointly employ the same employees as affiliates except as provided for in Rule V.E. (Rule V.G.)

    i. Human Resources will assign~~Complete~~ the *SWG CA Affiliates Journey for New Hires or Rehires* ~~in~~ in the SWGreat! Employee Connect system to~~for~~ each employee temporarily assigned to, permanently hired by, or returning from an affiliate.
    ii. The journey provides ~~Provide~~ Form 105.1 (all four parts) for the employee to review and complete~~ion~~.
    iii. Once the transaction is ~~approved~~completed in SWGreat! Employee connect.~~, an approval notification is received.~~ Human Resources will f~~F~~orward ~~the notification and~~ the attached agreement (all four parts) ~~to Human Resources~~ to the Compliance Officer.

m. Notify Human Resources prior to temporarily assigning a Company employee to an affiliate. Do not temporarily assign a Company employee to an affiliate in excess of 30% of such employee's chargeable time in any calendar year. (Rule V.G.2.e.)
n. Do not temporarily assign any Company employee to an energy marketing affiliate. (Rule V.G.2.e.)
o. Report all transfers of goods and services between the Company and affiliates to the Controller and the Compliance Officer. (Rule V.H.)

p. Ensure that employees under your area of responsibility do not offer new non-tariffed products and services except through affiliates or as otherwise provided. (Rules VII.A, VII.C, and VII.I.)
q. Immediately notify the Compliance Officer of any new non-tariffed products and services and verify CPUC approval has been obtained prior to offering any new non-tariffed products and services to customers. (Rule VII.E.)
r. Immediately notify the Compliance Officer of any sale, lease, assignment, or encumbrance of Company property if Company property is affected in any way as part of a non-tariffed product or service offering by the Company. (Rule VII.G.)

3. Compliance Officer

a. Coordinate the implementation and continuous enforcement of the Rules for the Company and its affiliates.
b. Maintain a current copy of this SP and the Rules.
c. Monitor compliance requirements of CPP 1000.01 and this SP and take appropriate action when warranted.
d. Coordinate with other departments as necessary in making records of transactions between the Company and affiliates available within 72 hours for third-party review. (Rule IV.F.)
e. Upon notification from Human Resources that more than five percent of Company employees are assigned to affiliates at any one time, notify the involved managers and affiliates to halt all assignments in excess of the five percent threshold. (Rule V.G.2.)
f. Upon notification that the Company intends to offer any new non-tariffed product or service, coordinate with ~~Rates and Regulatory Analysis~~Regulation, Internal Audit, the California Regulatory Manager and other departments, as necessary, to ensure compliance with Rules VII.D and VII.E.
g. Notify the California Regulatory Manager if the Company provides a discount, rebate or waiver of applicable charges for service provided to an affiliate. (Rule III.F.)

4. ~~Rates and Regulatory Analysis~~Regulation

a. Exclude all costs associated with affiliate research and development activities from rates to the Company's California customers. (Rule V.F.5.)
b. Exclude all costs associated with required independent compliance audits from rates to the Company's California customers. (Rule VI.C.)
c. Coordinate with other departments, as necessary, to ensure that all tariffed products and services offered by the Company meet the requirements of Rule VII.C.

5. California Regulatory Manager

a. Ensure that proper electronic notification and/or posting is made if the Company provides a discount, rebate or waiver of applicable charges for service provided to an affiliate. (Rule III.F.)
b. If a list of non-Company service providers that includes or identifies affiliates is developed, ensure that CPUC approval is obtained prior to the list being made available to customers. Maintain any lists of non-Company service providers that includes or identifies affiliates that have been approved by the CPUC. (Rule IV.C.2.)
c. Coordinate with Legal Affairs and the Compliance Officer in accordance with SP 110.0, Communications with State Regulatory Commissions, to file a Compliance Plan with the CPUC Energy Division no later than December 31 of each year (or as otherwise required by the Rules) whenever there has been a change in the Company's existing Compliance Plan or a change in the Company's affiliates. (Rule VI.A.)
d. Upon the creation of a new affiliate, ensure posting of the appropriate electronic notice, and coordinate with Legal Affairs and the Compliance Officer to file an advice letter demonstrating how the Rules will be implemented with respect to the new affiliate, no later than 60 days following the creation of the new affiliate. (Rule VI.B.)
~~d.~~e. Coordinate with Human Resources and the Controller, as necessary, when an employee transfers from the Company to a non-exempt Rule II.B. affiliate. Provide associated transfer fee amount to the Controller for invoice preparation. Notify the Compliance Officer of the qualifying employee transfer and associated fee to be paid. (Rule V.G.2.c.) A transfer is defined as an employee who leaves the Company to work at an affiliate, or vice versa. The transfer must take place within sixty (60) days to be subject to this SP.
~~e.~~f. Coordinate with Internal Audit and other departments, as necessary, to ensure that the annual independent audit report is filed with the CPUC no later than May 1 of each year. (Rule VI.C.)
~~f.~~g. Ensure Company compliance with filing and reporting requirements for existing and new non-tariffed products or services. (Rules VII.C, VII.E, and VII.H.)

6. Controller

a. Contract (at shareholder expense) external auditors to perform an annual audit of the Company's compliance with the Rules (Rule VI.C).
~~a.~~b. Maintain Company books and records separate from affiliate books and records and apply all required accounting standards. (Rule V.B.)
~~b.~~c. Record all joint purchases of goods and services made by the Company and affiliates in a manner that clearly identifies the Company and affiliate portions of such purchases and allocate costs according to CPUC guidelines. (Rule V.D.)

~~c.~~d. Prepare invoices for fees associated with permitted, shared corporate support services provided by the Company to affiliates, and ensure accurate pricing. (Rule V.E.)

~~d.~~e. Prepare invoices, with information from Human Resources, for fees associated with direct employee movement, and account for such fees in accordance with Rule V.G.2.c. Notify the Compliance Officer prior to billing the affiliate. The transfer fee must be collected from the affiliate before the end of the current calendar year in which the annual report is submitted to the Commission that includes notification of an employee transfer.

~~e.~~f. Prepare invoices, with information from Human Resources, for fees associated with the temporary use by affiliates of Company employees, and account for such fees. (Rule V.G.2.e.) Notify the Compliance Officer prior to billing the affiliate.

~~f.~~g. Prepare invoices for goods and services transferred to affiliates by the Company, account for these transfers, and ensure pricing is consistent with the Rules. (Rule V.H.)

~~g.~~h. Record all transfers or sales of goods and services from affiliates to the Company. (Rule V.H.)

7. Human Resources

a. Ensure the requirements and practices of SP 757.1, Personnel Hiring and Transferring, are in compliance with the Rules.
b. Document and report to the Compliance Officer and the Controller permanent or temporary employee movement between the Company and affiliates. Track each temporary assignment to an affiliate. (Rule V.G.2.)
c. If more than five percent of the Company's employees are assigned to affiliates at any one time, immediately notify the Compliance Officer. (Rule V.G.2.)
d. When employees are terminated and immediately hired by affiliates, transferred from the Company to non-exempt Rule II.B. affiliates, or returning to the Company for employment from non-exempt Rule II.B. affiliates, inform the California Regulatory Manager ~~within thirty (30) days~~by the end of the calendar year of such employee transfers and ensure a signed copy of Form 105.1 for each employee transfer has~~ve~~ been ~~filed~~completed. (Rule V.G.2.)
e. Ensure employee movement between the Company and affiliates is in compliance with the Rules. (Rule V.G.2.b.)

8. Energy Solutions and Gas Purchases and Transportation

a. Apply the Company's tariff uniformly to all market participants. (Rules III.B.3 and III.B.4.)

b. Ensure the Company does not condition or tie the provision of any of its services to the receipt of any goods or services from affiliates. (Rule III.C.)
c. Ensure the Company does not solicit business, provide any market and/or customer-sensitive information, or give the appearance that the Company speaks for affiliates. (Rules III.E, IV.A, IV.B, and IV.E.)
d. Ensure the Company does not promote, advertise, or market for or with affiliates. (Rule V.F.1.)
e. Ensure the Company does not represent that affiliates will receive any different treatment than any other market participant. (Rule V.F.2.)
f. Ensure the Company does not provide advertising for affiliates unless it provides similar access to all market participants. (Rule V.F.3.)
g. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)
h. Notify the Compliance Officer of any new non-tariffed product or service prior to offering or providing such product or service (Rule VII.D.)

9. <u>Systems Planning</u>

Ensure the Company does not provide engineering services for affiliates. (Rule IV.E.)

10. <u>Legal Affairs/General Counsel</u>

a. Serve as a repository of data for the Company for the creation of new affiliates and the dissolution of existing affiliates and inform the Compliance Officer of any changes to the Company's affiliates. (Rule VI.A and VI.B.)
b. Ensure the Company and affiliates are separate corporate entities. (Rule V.A.)
c. Ensure the Company and affiliates do not have any common directors or officers, except as may be permitted by the Rules. (Rule V.G.1.)
d. Coordinate with the California Regulatory Manager and the Compliance Officer, as necessary, in accordance with SP 110.0, Communications with State Regulatory Commissions, to file a Compliance Plan with the CPUC Energy Division no later than December 31 of each year (or as otherwise required by the Rules) whenever there has been a change in the Company’s existing Compliance Plan or a change in the Company’s relationship(s) with its affiliates. (Rule VI.A.)
e. Upon the creation of a new affiliate, coordinate with the California Regulatory Manager and the Compliance Officer, as necessary, to file an advice letter demonstrating how the Rules will be implemented with respect to the new affiliate, no later than 60 days following the creation of the affiliate. (Rule VI.B.)

f. Ensure the officers and employees of Company affiliates are available to testify upon request of the CPUC. (Rule VI.D.)

11. Corporate Purchasing

a. Ensure the requirements and practices of SP 190.0, Purchasing Goods, are ~~in compliance~~compliant ~~-~~with the Rules.
b. Ensure the Company provides nonpublic information and data which has been received from unaffiliated suppliers to affiliates or unaffiliated entities only after the Company first obtains written affirmative authorization to do so from the supplier. The Company shall not actively solicit the release of such information exclusively to its affiliates while making an effort to keep such information from other unaffiliated entities. (Rule IV.D.)
c. Maintain Company transactions, contracts, and related bid records with affiliates in accordance with the Rules. (Rules IV.F, and IV.G.)

12. Contract Administration

a. Ensure the requirements and practices of SP 195.0, Procuring Services (Corporate Contract Administration), are ~~in compliance~~compliant ~~-~~with the Rules.
b. Ensure the Company provides nonpublic information and data which has been received from unaffiliated suppliers to affiliates or unaffiliated entities only after the Company first obtains written affirmative authorization to do so from the supplier. The Company shall not actively solicit the release of such information exclusively to its affiliates while making an effort to keep such information from other unaffiliated entities. (Rule IV.D.)
c. Maintain Company transactions, contracts, and related bid records with affiliates in accordance with the Rules. (Rule IV.F, and IV.G.)

13. Internal Audit

~~Contract (at shareholder expense) external auditors to perform an annual audit of the Company's compliance with the Rules. (Rule VI.C.)~~

a. Ensure periodic audits are performed for non-tariffed products and services in compliance with the Rules. (Rule VII.D.4.) Internal Audit will be informed by the California Regulatory Manager at such time non-tariffed products and services are offered or performed by ~~SWG~~the Company.
b. Perform testing as directed by the external auditor in support of the annual audit of the Company's compliance with the Rules. Report any areas of non-compliance identified during the annual audit to the Compliance Officer and others, as necessary. Obtain responses from the Compliance Officer and others as necessary regarding how such

matters are to be addressed. Monitor progress to ensure timely resolution of issues.

14. Corporate Supply Chain, Fleet and Real Estate & Facilities ~~& Administrative Services~~

    Ensure the Company does not share plant, facilities, or equipment with affiliates, except for permitted corporate support functions. (Rule V.C.)

15. Strategy & Corporate Development

    a. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)
    b. Notify the Compliance Officer of any new non-tariffed product or service prior to offering or providing such product or service (Rule VII.D.)

16. Engineering Staff

    a. Ensure the Company does not share or subsidize research and development costs with affiliates. (Rule V.F.5.)
    b. Notify the Compliance Officer of any new non-tariffed product or service prior to offering or providing such product or service (Rule VII.D.)

KEYWORDS AND DEFINITIONS

1. Affiliate - An affiliate is defined by the CPUC as any person, corporation, utility, partnership, company, or other entity of which five percent or more of its outstanding securities is owned, controlled, or held with the power to vote, directly or indirectly, either by the Company or any of its affiliates.
2. Rule II.B Affiliate - An affiliate that provides a product that uses natural gas or a service that relates to the use of natural gas. Transactions between the Company's California public utility operations and the Company's Rule II.B affiliates transacting business in California are subject to the Rules.
3. Exempt Affiliate - A Rule II.B affiliate for which the CPUC has granted Company an exemption from the applicability of the Rules.

IV. RELATED POLICIES, FORMS AND RESOURCES

Corporate Policy & Practice

1000.01 - California Affiliate Transaction Rules Compliance Plan

Standard Practices

110.0 - Communications with State Regulatory Commissions

190.0 - Purchasing Goods

195.0 - Procuring Services (Corporate Contract Administration)

757.1 - Personnel Hiring and Transferring

Forms

105.1 California Affiliate Transaction Rules Compliance Plan Work Assignment Agreement (computer-produced ~~Microsoft~~ ~~Word~~ e-form only)

Other

California Affiliate Transaction Rules

Advice Letter No. 1348-G
Attachment C

SOUTHWEST GAS CORPORATION
(U 905 G)
Summary of Affiliates

SOUTHWEST GAS CORPORATION
ADVICE LETTER NO. 1348
ATTACHMENT C
SUMMARY OF AFFILIATES

Name	Headquarters Business Address	Primary Officers	Business Activity	Affiliate Transaction Rules Status
Great Basin Gas Transmission Company (Great Basin) (fka, Paiute Pipeline Company)	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, Chair of the Board/Chief Executive Officer * Justin Lee Brown, President * Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Amy L. Timperley, Senior Vice President/Chief Regulatory, Public Affairs & Gas Resources Officer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	FERC jurisdictional interstate natural gas pipe-line. The system extends from the Idaho-Nevada border to the Nevada-California border.	Exempt per D.99-02-086
Southwest Gas Holdings, Inc.	8360 South Durango Drive Las Vegas, NV-89113-4444	* E. Renae Conley, Chair of the Board * Karen S. Haller, President/Chief Executive Officer Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Fabio Pineda, Vice President/Controller/Chief Accounting Officer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Holding company.	Non-Rule II.B. affiliate
Southwest Gas Transmission Co. (SGTC)	8360 South Durango Drive Las Vegas, NV 89113-4444	Not Applicable	FERC jurisdictional interstate natural gas pipeline transporting gas to Southwest Gas' southern Nevada system. SGTC does not provide service in California.	Exempt per D.99-02-086
Southwest Gas Utility Group, Inc.	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, President/Chief Executive Officer * Justin Lee Brown, President Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Holding company.	Non-Rule II.B. affiliate
The Southwest Companies (SC)	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, President/Chief Executive Officer * Justin Lee Brown, President Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Holding company for temporary possession of certain real estate subsidiaries. Currently inactive.	Exempt per D.99-02-086
Utility Financial Corp. (UFCO)	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, President/Chief Executive Officer * Justin Lee Brown, President Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Minority limited partner in SGTC.	Exempt per D.99-02-086

List of Directors:

The Directors for Great Basin, SC and UFCO are: 1) *Karen S. Haller; 2) *Catherine M. Mazzeo; 3) *Robert J. Stefani.
The Directors for Southwest Gas Holdings, Inc. are: 1) *E. Renae Conley; 2) Andrew W. Evans; 3) Henry P. Linginfelter; 4) *Karen S. Haller
5) Anne L. Mariucci; 6) Andrew J. Teno; 7) Brian E. Sandoval; 8) Ruby Sharma; 9) Jane Lewis-Raymond; 10) Leslie T. Thornton; 11) Carlos A. Ruisanchez
The Directors for Southwest Gas Utility Group, Inc., are: 1) *Robert J. Stefani; 2) * Karen S. Haller; 3) Carlos A. Ruisanchez.

* indicates a shared officer or director.

Advice Letter No. 1348-G
Attachment C

SOUTHWEST GAS CORPORATION
(U 905 G)
Summary of Affiliates

<u>REDLINED</u>

SOUTHWEST GAS CORPORATION
ADVICE LETTER NO. 13~~20~~48
ATTACHMENT C
SUMMARY OF AFFILIATES

Name	Headquarters Business Address	Primary Officers	Business Activity	Affiliate Transaction Rules Status
~~Centuri Group, Inc. (formerly Isleworth Holding Company)~~	~~19820 North 7th Ave., Ste 120 Phoenix, AZ 85027-4167~~	~~Christian Brown, President/Chief Executive Officer~~ ~~Gregory A. Izenstark, Executive VP/Chief Financial Officer/Treasurer~~ ~~Jason S. Wilcock, Executive VP/Chief Legal and Administrative Officer/Corporate Secretary~~ ~~*~~ ~~Dorothea Camarote, Assistant Secretary~~	~~Holding company~~	~~Rule II.B affiliate~~
~~IntelliChoice Energy LLC (IntelliChoice)~~	~~19820 North 7th Ave., Ste 120 Phoenix, AZ 85027-4167~~	~~Christian Brown, Chief Executive Officer~~ ~~Jason S. Wilcock, Secretary~~ ~~Gregory A. Izenstark, Treasurer~~	~~Joint venture. Majority-owned subsidiary of NPL. Formed to market and commercialize natural gas-fired heat pump technology.~~	~~Limited exemption per D.10-09-005~~
~~IntelliChoice Energy of California LLC~~	~~19820 North 7th Ave., Ste 120 Phoenix, AZ 85027-4167~~	~~Christian Brown, Chief Executive Officer~~ ~~Jason S. Wilcock, Secretary~~ ~~Gregory A. Izenstark, Treasurer~~	~~Wholly-owned subsidiary of IntelliChoice, formed to market/commercialize natural gas-fired pump heat technology in California~~	~~Rule II.B affiliate~~
~~NPL Construction Co. (NPL)~~	~~19820 North 7th Ave., Ste 120 Phoenix, AZ 85027-4167~~	~~Dylan A. Hradek, President/Chief Executive Officer~~ ~~Gregory A. Izenstark, Executive VP/Chief Financial Officer/Treasurer~~ ~~Jason S. Wilcock, Executive VP/Chief Legal and Administrative Officer/Corporate Secretary~~ ~~Joshua P. Adams, Assistant Secretary - West Virginia Operations~~	~~Full service pipeline distribution system contractor.~~	~~Rule II.B affiliate~~
Great Basin Gas Transmission Company (Great Basin) (fka, Paiute Pipeline Company)	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, Chair of the Board/Chief Executive Officer * Justin Lee Brown, President * Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Amy L. Timperley, Senior Vice President/Chief Regulatory, Public Affairs & Gas Resources Officer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	FERC jurisdictional interstate natural gas pipe-line. The system extends from the Idaho-Nevada border to the Nevada-California border.	Exempt per D.99-02-086
~~Southwest Administrators, Inc. (SA)~~	~~19820 North 7th Ave., Ste 120 Phoenix, AZ 85027-4167~~	~~Christian Brown, President/Chief Executive Officer~~ ~~Duane T. Stott, Vice President~~ ~~Jason S. Wilcock, Secretary~~ ~~Gregory A. Izenstark, Treasurer~~	~~Wholly owned subsidiary of NPL. Formed to provide pipeline construction service in California.~~	~~Rule II.B affiliate. Limited exemption per D.99-11-016 for transactions outside of California~~
Southwest Gas Holdings, Inc.	8360 South Durango Drive Las Vegas, NV-89113-4444	* E. Renae Conley, Chair of the Board * Karen S. Haller, President/Chief Executive Officer Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * ~~Lori L. Colvin,~~ Fabio Pineda, Vice President/Controller/Chief Accounting Officer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Holding company.	Non-Rule II.B. affiliate
Southwest Gas Transmission Co. (SGTC)	8360 South Durango Drive Las Vegas, NV 89113-4444	Not Applicable	FERC jurisdictional interstate natural gas pipeline transporting gas to Southwest Gas' southern Nevada system. SGTC does not provide service in California.	Exempt per D.99-02-086

SOUTHWEST GAS CORPORATION
ADVICE LETTER NO. 13~~20~~48
ATTACHMENT C
SUMMARY OF AFFILIATES

Name	Headquarters Business Address	Primary Officers	Business Activity	Affiliate Transaction Rules Status
Southwest Gas Utility Group, Inc.	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, President/Chief Executive Officer * Justin Lee Brown, President Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Holding company.	Non-Rule II.B. affiliate
The Southwest Companies (SC)	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, President/Chief Executive Officer * Justin Lee Brown, President Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Holding company for temporary possession of certain real estate subsidiaries. Currently inactive.	Exempt per D.99-02-086
Utility Financial Corp. (UFCO)	8360 South Durango Drive Las Vegas, NV 89113-4444	* Karen S. Haller, President/Chief Executive Officer * Justin Lee Brown, President Catherine M. Mazzeo, Senior Vice President/Chief Legal, Safety & Compliance Officer and * Corporate Secretary * Robert J. Stefani, Senior Vice President/Chief Financial Officer * Justin S. Forsberg, Vice President/Investor Relations/Treasurer * Dorothea Camarote, Assistant Corporate Secretary * Dana R. Walsh, Assistant Corporate Secretary	Minority limited partner in SGTC.	Exempt per D.99-02-086

List of Directors:

The Directors for Great Basin, SC and UFCO are: 1) *Karen S. Haller; 2) *Catherine M. Mazzeo; 3) *Robert J. Stefani.
The Directors for Southwest Gas Holdings, Inc. are: 1) *E. Renae Conley; 2) Andrew W. Evans; 3) Henry P. Linginfelter; 4) *Karen S. Haller 5) Anne L. Mariucci; 6) Andrew J. Teno; 7) ~~A. Randall Thoman~~Brian E. Sandoval; 8) Ruby Sharma; 9) Jane Lewis-Raymond; 10) Leslie T. Thornton; 11) Carlos A. Ruisanchez
The Directors for Southwest Gas Utility Group, Inc., are: 1) *Robert J. Stefani; 2) * Karen S. Haller; 3) ~~A. Randall Thoman~~Carlos A. Ruisanchez.

~~The Directors for Centuri Group, Inc., are: 1) * Karen S. Haller; 2) Christian Brown; 3) Jason S. Wilcock.~~

~~The Directors of NPL Construction Co. are: 1) Jason S. Wicock; 2) Gregory A. Izenstark.~~
~~The Directors of Southwest Administrators, Inc. are: 1) Jason S. Wilcock; 2) Gregory A. Izenstark; 3) Christian Brown.~~
~~The Board of Managers of IntelliChoice Energy, LLC are: 1) Jason S. Wilcock; 2) Gregory A. Izenstark; 3) Christian Brown.~~
~~The Board of Managers of IntelliChoice Energy of California, LLC are: 1) Christy M. Berger; 2) David J. Randall; 3) Jason S. Wilcock.~~

* indicates a shared officer or director.

Advice Letter No. 1348-G
Attachment D

Official Service List in
R.97-04-011/I.97-04-012

************** SERVICE LIST **************
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I9704012

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ADVICE LETTER SUMMARY

ENERGY UTILITY

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

Company name/CPUC Utility No.: Southwest Gas Corporation (U 905 G)

Utility type:

- ☐ ELC
- ☑ GAS
- ☐ WATER
- ☐ PLC
- ☐ HEAT

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EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 1348-G

Tier Designation: Tier 1

Subject of AL: Update to California Affiliate Transaction Rules Compliance Plan

Keywords (choose from CPUC listing): Affiliate

AL Type: ☐ Monthly ☐ Quarterly ☑ Annual ☐ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
D.97-12-088/D.98-08-035

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: Not applicable.

Summarize differences between the AL and the prior withdrawn or rejected AL: Not Applicable.

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: 10/6/25

No. of tariff sheets: 0

Estimated system annual revenue effect (%): Not applicable.

Estimated system average rate effect (%): Not applicable.

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: Not applicable.

Service affected and changes proposed[1]: See 'Subject of AL' above

Pending advice letters that revise the same tariff sheets: Not applicable.

[1]Discuss in AL if more space is needed.

Clear Form

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:

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Clear Form

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
Curtailable 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	