PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



May 10, 2007

Advice Letter: 777

Mr. Roger C. Montgomery, V. P. Pricing and Tariffs
Southwest Gas Corporation
P O Box 98510
Las Vegas, NV 89193-8510

Reference: To Notify the Commission Regarding the Formation of a New Affiliate Pursuant to Rule VI.B of the Affiliate Transaction Rules

Dear Mr. Montgomery:

Advice Letter 777 is effective May 13, 2007. A copy of the advice letter is returned herewith for your files.

Sincerely,

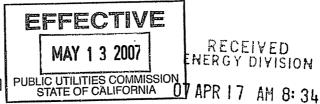
Sean H. Gallagher, Director

5 V Sulph

Energy Division



SOUTHINEST GOS CORPORATION



Roger C. Montgomery, Vice President/Pricing

April 13, 2007

APR 1 3 2007

PUBLIC UTILITIES COMMISSION STATE OF CALIFORNIA

California Public Utilities Commission Energy Division Attention: Sean Gallagher, Director 505 Van Ness Avenue, Room 4004 San Francisco, CA 94102

Subject:

Southwest Gas Corporation (U 905 G)

Advice Letter No. 777

Dear Mr. Gallagher:

Enclosed herewith are an original and six (6) copies of Southwest Gas Corporation's Advice Letter No. 777. There are no tariff sheets associated with this filing.

Sincerely,

Roger C. Montgomery

RCM:vo Enclosures Advice Letter No. 777

April 13, 2007

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Southwest Gas Corporation (Southwest) herewith submits Advice Letter No. 777 to notify the California Public Utilities Commission (Commission) of the creation of a new affiliate as defined in the Commission's Affiliate Transaction Rules (Rules). There are no tariff sheets associated with this filing.

In accordance with the Commission Decision No. (D.) 97-12-088, in OIR 97-04-011/OII 97-04-012, Appendix A. Rule VI.B, as modified by D.98-08-035, Southwest is required to notify the Commission of the creation of any new affiliate addressed by these Rules. Accordingly, Southwest is hereby notifying the Commission of the creation of a new affiliate, Specialty Services, Inc. (Specialty) as shown on Attachment A. Specialty will become a formal entity upon the approval of its corporate structure, which expected to occur at Southwest's next Board of Directors meeting on May 3, 2007.

There are no unusual or unique circumstances which exist that would require affiliate transaction rule measures beyond those already identified by Southwest in its California Affiliate Transaction Rules Compliance Plan (Plan). Therefore, Southwest will apply the provisions of its Plan to any and all transactions between the utility and the new affiliate.

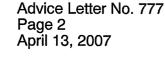
This filing will not increase any rate or charges for any class of customers, cause the withdrawal of service, or conflict with any other rate schedules or rules.

Southwest believes that this filing is subject to Energy Division disposition and therefore respectfully requests that it become effective May 13, 2007, which is thirty (30) calendar days from the date filed.

Anyone wishing to protest this filing may do so by sending a letter within 20 days of the filing. The protest should set forth the grounds upon which it is based and should be submitted expeditiously. There is no restriction on who may file a protest. Protests should be mailed to:

Investigation, Monitoring & Compliance Program Manager California Public Utilities Commission, Energy Division 505 Van Ness Avenue, Room 4002 San Francisco, CA 94102 Facsimile: 415-703-2200

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





Mr. John P. Hester, Senior Vice President Regulatory Affairs and Energy Resources Southwest Gas Corporation P.O. Box 98510 Las Vegas, Nevada 89193-8510 Facsimile: 702-876-7037

In accordance with General Order 96-A, Section III, Paragraph G, Southwest is mailing copies of this advice letter and related tariff sheets to the utilities and interested parties shown on the attached list.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

Roger C. Montgomery

DISTRIBUTION LIST

Advice Letter No. 777
In conformance with G.O. 96-A, III-G

Southern California Edison Company
Pacific Gas & Electric Company
Sierra Pacific Power Company
San Diego Gas & Electric Company
Southern California Gas Company
Director/Division of Ratepayer Advocates

SOUTHWEST GAS CORPORATION ATTACHMENT A NOTIFICATION OF THE CREATION OF A NEW AFFILIATES

Affiliate Transaction Rules Status	Rule II.B. Affiliate Subject to Rules
Business Activity	Wholly owned subsidiary of Northern Pipeline. Formed to provide high-pressure natural gas pipeline welding services.
Primary Officers	TBD
Headquarters Business Address	1 West Deer Valley Road, Suite 101 Phoenix, AZ 85027
Name	Specialty Services, Inc.

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLET	TED BY UTILITY (At	tach additional pages as needed)	
Company name/CPUC Utility No. Southwest Gas Corporation (U 905 G)			
Utility type:	Contact Person: Roger C. Montgomery		
□ ELC MAS F	Phone #: (702)87	<u>6-7321</u>	
□ PLC □ HEAT □ WATER F	E-mail: roger.mor	ntgomery@swgas.com	
EXPLANATION OF UTILITY TYP			
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat W	/ATER = Water		
Advice Letter (AL) #: 777			
Subject of AL: To notify the Commis Rule VI.B of the Affiliate Transaction		he formation of a new affiliate pursuant to	
Keywords (choose from CPUC listing):			
AL filing type: A Monthly 🗆 Quarterly		ne-Time	
If AL filed in compliance with a Comm			
Does AL replace a withdrawn or rejec	eted AL? If so, ide	ntify the prior AL Not applicable	
Summarize differences between the A	AL and the prior w	rithdrawn or rejected AL¹: Not applicable	
Resolution Required? 🛮 Yes 🕅 No			
Tequested effective date: May 13, 20	007	No. of tariff sheets: None	
stimated system annual revenue effect: (%): Not applicable			
Estimated system average rate effect	(%): Not applicab	<u>lle</u>	
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: <u>Not applicable</u>			
Service affected and changes proposed1: See 'Subject of AL' above			
Pending advice letters that revise the same tariff sheets: Not applicable			
Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:			
CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Ave., San Francisco, CA 94102 jjr@cpuc.ca.gov and jnj@cpuc.ca.go		Itility Info (including e-mail) Mr. John P. Hester, Sr. Vice-Pres. Reg. Affairs & Energy Resources Southwest Gas Corporation P. O. Box 98510 Las Vegas, NV 89193-8510 john.hester@swgas.com Facsimile: 702-876-7037	

 $^{^{\}rm l}$ Discuss in AL if more space is needed.

Updated: December 5, 2006

CALIFORNIA ADVICE LETTER DISTRIBUTION

Advice Letter No. ______777__

Date Mailed 4/13/07

Las Vegas	
J. Hester/ W. Moody	LVB-227
M. Anderson	LVB-521
C. Berger	LVB-100
A. Bettwy	LVB-110
J. Cattanach	LVB-185
R. Centrella	LVC-270
R. Clayton	LVA-300
L. Colvin	LVC-420
T. Day	LVB-100
B. DeLong	LVB-100
E. Gieseking	LVB-100
L. Harris	LVB-370
L. Hoffman	LVC-435
D. Jacobson	LVB-105
E. Janov	LVB-266
B. Johnson	LVA-120
R. Jordan	LVB-185
J. Kane	LVB-230
R. Kantor	LVC-435
M. Kirk	LVC-420
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V. Ontiveroz	LVB-105
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J. Ramirez	LVB-106
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L. Rich	LVB-420
R. Sable	LVB-105
T. Sheets	LVB-241
J. Stein	LVB-106
A. Timperley	LVC-330
E. Trombley	LVB-106
L. Wamble	LVC-420
D. Zalewski	LVC-420
L. Duarte (Log Copy)	LVB-105

No. Cal.)
ALDERNALISM CHROLIDATION AREALISM CAPELLE MANAGEMENT CO.
24A-170
24A-002
24A-295

Truckee	(No. Cali)
Truckee	15A-003
Sales	15A-003

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F. Hart	34A-002

★ Needles reports to Bullhead

(For posting at offices - use POSTING COPY stamp)

California Public Utilities Commission Energy Division Attention: Jerry Royer 505 Van Ness Avenue, 4th Floor Francisco, CA 94102

Original plus 6, plus SWG (7 copies)

Attach a note to SWG's copy with the request: "Please stamp the attached copy and return to us in the self-addressed stamped envelope provided."

Address on SASE envelope:

(Your name)
State Regulatory Affairs, LVB-105
Southwest Gas Corporation
5241 Spring Mountain Road
PO Box 98510
Las Vegas, NV 89193-8510

Victorville (So. Cal.)	
L. Frisby (5)	12A-003
P. Hamer	120-295
IGE/Sales (So.Cal. Rate Filing only)	120-170
J. Rowell	12A-002

California Advice Filings Sheet 2 of 2

R. Thomas Beach 2560 Ninth Street, Suite 316 Berkeley, CA 94710

Gretchen DiAlto, Tariff Administration Regulatory Affairs Sempra Energy 555 West 5th Street, M.L. 14D6 Los Angeles, CA 90013-1011

Lee Schavrien, Manager Regulatory Affairs, Room 10A San Diego Gas & Electric Company PO Box 1831 San Diego, CA 92112

Bruce Folsom Manager, Regulatory Compliance 1411 East Mission, MSC-29 PO Box 3727 Spokane, WA 99220-3727

Pat Franklin Sierra Pacific Power Company PO Box 10100 Reno, NV 89520-0026

Office of Ratepayer Advocates California Public Utilities Commission 505 Van Ness Avenue, Room 4202 San Francisco, CA 94102

John Clarke
Pacific Gas & Electric Company
77 Beale Street, Room 1001
San Francisco, CA 94177

James McTarnaghan, Partner Duane Morris LLP One Market, Spear Tower, Suite 2000 San Francisco, CA 94105-1104

SOUTHERN CALIFORNIA - RATES Only

Ronald Moore Regulatory Affairs Southern California Water Company 630 East Foothill Boulevard San Dimas, CA 91773