

ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: Southwest Gas Corporation

Date Utility Notified: 3/29/2025

Utility Number/Type: U 905 G

E-Mailed to: Valerie.ontiveroz@swgas.com

Advice Letter Number(s): 1328-G

ED Staff Contact: Sasha Merigan

Date AL(s) Filed: 2/27/2025

ED Staff Email: amq@cpuc.ca.gov

Utility Contact Person: Valerie J. Ontiveroz

ED Staff Phone No.: (585) 705-7525

Utility Phone No.: (702) 876-7323

☒ **INITIAL SUSPENSION (up to 120 DAYS from the expiration of the initial review period)**

This is to notify that the above-indicated AL is suspended for up to 120 days beginning **March 29, 2025** (30 days after the Advice Letter is filed) for the following reason(s) below. If the AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division extends beyond the expiration of the initial suspension period, the advice letter will be automatically suspended for up to 180 days beyond the initial suspension period.

☐ A Commission Resolution is Required to Dispose of the Advice Letter

☐ Advice Letter Requests a Commission Order

☒ Advice Letter Requires Staff Review

The expected duration of initial suspension period is 120 days

☐ **FURTHER SUSPENSION (up to 180 DAYS beyond initial suspension period)**

The AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division has extended beyond the expiration of the initial suspension period. The advice letter is suspended for up to 180 days beyond the initial suspension period.

If you have any questions regarding this matter, please contact Sasha Merigan at amq@cpuc.ca.gov

cc:

ED Tariff Unit

Supervisor: Nick Zanjani, Building Decarbonization and Renewable Gas Section



SOUTHWEST GAS CORPORATION

February 27, 2025

Advice Letter No. 1328-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Fourth Quarter 2024 Biomethane Gas Plan Report Pursuant to Decision (D.) 20-05-003

The purpose of this Advice Letter is for Southwest Gas Corporation (Southwest Gas) to submit its Biomethane Gas Plan (BGP) Quarterly Report pursuant to Ordering Paragraph (OP) 8 in D.20-05-003.¹ There are no tariff sheets being modified because of this submission.

Background

On May 7, 2020, the Commission issued D.20-05-003 authorizing Southwest Gas to revise its California Gas Tariff to: 1) make permanent the temporary modifications to the Gas Cost Incentive Mechanism (GCIM) in Preliminary Statement 17 that the Commission previously approved in October 2016 (2016 Modification); 2) implementation of the BGP within the GCIM; and 3) modification of Southwest Gas' transportation customer balancing requirements and Operational Flow Orders (OFOs) provisions in Rule No. 21 – Transportation of Customer-Secured Natural Gas (Rule No. 21). Specifically, the BGP provides the mechanism to pass all renewable gas costs and revenues through to Southwest Gas customers. OP 8 in D.20-05-003 states:

Southwest Gas Corporation shall provide the Commission's Energy Division with quarterly reports on its Biomethane Gas Program (BGP) activities relating to the approval of the BGP Modification and Rule 21 Modification herein authorized. Prior to submitting the preliminary quarterly report, Southwest Gas Corporation shall request input and approval from the Commission's Energy Division in developing the reporting template.²

Pursuant to OP 8, Energy Division approved Southwest Gas' reporting template. Additionally, given that D.20-05-003 does not include reporting due dates, Energy Division approved of the following BGP quarterly reporting schedule:

¹ D.20-05-003 issued in Application 19-02-002, *Application of Southwest Gas Corporation (U 905 G) for Authority to Revise its California Gas Tariff to Modify the Gas Cost Incentive Mechanism, implement a Biomethane Gas Program, and Modify Transportation Customer Balancing Requirements and Operational Flow Orders*, filed February 1, 2019.

² D.20-05-003 at pg. 23.



<u>Quarter</u>	<u>Gas Flow Dates</u>	<u>Accounting Period</u>	<u>Report Due Date</u>
1	January – March	February – April	May 31
2	April – June	May – July	August 31
3	July – September	August – October	November 30
4	October - December	November – January	February 28

Energy Division also directed Southwest Gas to submit the report through a Tier 1 Advice Letter to provide parties more notice and transparency.

Although BGP quarterly reporting began in calendar year 2021, Southwest Gas did not have any biomethane gas purchases. Therefore, quarterly reporting began in calendar year 2022.³

Biomethane Gas Plan Report

Southwest Gas submits its fourth quarter 2024 Biomethane Gas Plan Report for the October through December 2024 gas flow dates (Attachment A). The report reflects BGP activity with respect to Southwest Gas' Southern California service territory. No biomethane gas purchases were made in Southwest Gas' Northern California service territory.

The report is submitted in both public and confidential versions. The confidential report is being submitted to the Energy Division under separate cover along with the *Declaration of Christopher Brown Regarding the Confidentiality of Certain Data*.

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

Effective Date

Pursuant to Energy Division direction, Southwest Gas believes this Advice Letter should be classified as Tier 1 (effective pending Energy Division disposition) pursuant to General Order (GO) 96-B and per the direction of Energy Division Staff. Southwest Gas respectfully requests that this Advice Letter be accepted effective February 27, 2025, which is the date submitted.

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

³ In lieu of quarterly Advice Letters, Southwest Gas submitted written correspondence to Energy Division Staff confirming that it had not made any biomethane gas purchases for each quarter in 2021.



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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
Senior Manager/Regulatory Affairs & Compliance
Email: valerie.ontiveroz@swgas.com
regserve@swgas.com


Notice

Southwest Gas believes it is exempt from the notice requirements set forth in General Rule 4.2 of GO 96-B, since this Advice Letter is being submitted pursuant to OP 8 in D.20-05-003 and will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule that are currently in effect.

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 the service list in A.19-02-002.

Respectfully submitted,
SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachments

Distribution List

Advice Letter No. 1328-G

In conformance with GO 96-B, General Rule 4.3

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

Linda Serizawa, Director
Public Advocates Office
California Public Utilities Commission
Linda.Serizawa@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@SemptraUtilities.com

Michael Campbell
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

Scott Blaising
blaising@braunlegal.com

Jim Mosher
copperbeechllc@gmail.com

Southwest Gas Corporationn (U 905 G)
Advice Letter No. 1328-G

Southern California Service Territory

Biomethane Gas Program Activity Quarterly Report
October 2024 - December 2024 (November 2024 - January 2024 accounting period)

Total BGP Purchases									
<u>Supplier</u>	<u>Exhibit No.</u>	<u>Package</u>	<u>Delivery Dates</u>	<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Cost (\$)</u>	<u>Environmental Attributes (Yes/No)</u>	<u>Included in Supply Portfolio (Yes/No)</u>	
			October 2024 - December 2024		\$	\$	No	Yes	
			October 2024 - December 2024		\$	\$	No	Yes	
			Total BGP Purchases		\$	\$			

BGP Purchases Not Included In Supply Portfolio									
				<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Cost (\$)</u>			
			Total BGP Non-Supply Portfolio Purchases	-	\$ -	\$ -			

BGP Sales (excludes quantities included in supply portfolio)									
<u>Buyer</u>	<u>Exhibit No.</u>	<u>Package</u>	<u>Delivery Dates</u>	<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Revenue (\$)</u>	<u>Environmental Attributes (Yes/No)</u>	<u>Included in Supply Portfolio (Yes/No)</u>	
N/A	N/A	N/A	N/A	-	\$ -	\$ -	No	No	
			Total BGP Non-supply Portfolio Sales	-	\$ -	\$ -			

BGP Purchases Included In Supply Portfolio									
				<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Cost (\$)</u>			
			Total BGP Supply Portfolio Purchases		\$	\$			
			Net Impact of Non-supply Portfolio Purchases and Sales	-	N/A	\$ -			
			Net BGP Impact on Portfolio		\$	\$			
			Total period gas supply quantity (Dth)	2,877,347					
			BGP Supply Portfolio Purchases percent of total purchases	3.62%					
			Total period gas supply commodity cost (\$)	\$ 11,988,685.75					
			Total period gas supply transportation and storage cost (\$)	\$ 5,705,269.36					
			Total period gas supply costs (\$)	\$ 17,693,955.11					
			BGP Supply Portfolio Purchases cost percent of total purchase cost	1.72%					

Southwest Gas Corporationnn (U 905 G)
Advice Letter No. 1328-G

Northern California Service Territory

Biomethane Gas Program Activity Quarterly Report
October 2024 - December 2024 (November 2024 - January 2024 accounting period)

Total BGP Purchases								
<u>Supplier</u>	<u>Exhibit No.</u>	<u>Package</u>	<u>Delivery Dates</u>	<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Cost (\$)</u>	<u>Environmental Attributes (Yes/No)</u>	<u>Included in Supply Portfolio (Yes/No)</u>
N/A	N/A	N/A	N/A	-	\$ -	\$ -	No	No
Total BGP Purchases				-	\$ -	\$ -		

BGP Purchases Not Included In Supply Portfolio			
	<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Cost (\$)</u>
Total BGP Non-Supply Portfolio Purchases	-	\$ -	\$ -

BGP Sales (excludes quantities included in supply portfolio)								
<u>Buyer</u>	<u>Exhibit No.</u>	<u>Package</u>	<u>Delivery Dates</u>	<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Revenue (\$)</u>	<u>Environmental Attributes (Yes/No)</u>	<u>Included in Supply Portfolio (Yes/No)</u>
N/A	N/A	N/A	N/A	-	\$ -	\$ -	No	No
Total BGP Non-supply Portfolio Sales				-	\$ -	\$ -		

BGP Purchases Included In Supply Portfolio			
	<u>Quantity (Dth)</u>	<u>Average Price (\$/Dth)</u>	<u>Total Cost (\$)</u>
Total BGP Supply Portfolio Purchases	-	\$ -	\$ -
Net Impact of Non-supply Portfolio Purchases and Sales	-	N/A	\$ -
Net BGP Impact on Portfolio	-	\$ -	\$ -
Total period gas supply quantity (Dth)	1,548,580		
BGP Supply Portfolio Purchases percent of total purchases	0.00%		
Total period gas supply commodity cost (\$)	\$ 5,671,412.40		
Total period gas supply transportation and storage cost (\$)	\$ 3,006,137.51		
Total period gas supply costs (\$)	\$ 8,677,549.91		
BGP Supply Portfolio Purchases cost percent of total purchase cost	0.00%		



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

Contact Person: Valerie J. Ontiveroz

Phone #: (702) 876-7323

E-mail: valerie.ontiveroz@swgas.com

E-mail Disposition Notice to: valerie.ontiveroz@swgas.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 1328

Tier Designation: Tier 1

Subject of AL: Fourth Quarter 2024 Biomethane Gas Plan Report Pursuant to Decision
(D.) 20-05-003

Keywords (choose from CPUC listing): Procurement

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

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
D.20-05-003

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: Southwest Gas Transportation Customer Names.
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: Confidential and public versions have been submitted, including Declaration.

Resolution required? ☐ Yes ☒ No

Requested effective date: 2/27/25

No. of tariff sheets: Not applicable.

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 proposed¹: See 'Subject of AL' above.

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

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: Ms. Valerie J. Ontiveroz
Title: Senior Manager/Regulatory Affairs & Compliance
Utility Name: Southwest Gas Corporation
Address: P. O. Box 98510
City: Las Vegas State: Nevada
Telephone (xxx) xxx-xxxx: 702-876-7323
Facsimile (xxx) xxx-xxxx: 702-364-3446
Email: valerie.ontiveroz@swgas.com

Name:
Title:
Utility Name:
Address:
City: State: Nevada
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
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	