

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to
Establish Policies, Processes, and
Rules to Ensure Safe and Reliable Gas
Systems in California and Perform
Long-Term Gas System Planning.

Rulemaking 24-09-012

(Filed September 26, 2024)

**SOUTHWEST GAS CORPORATION'S (U 905 G) NOTICE OF AVAILABILITY OF COST
DATA IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGES' RULING DIRECTING
GAS UTILITIES TO PROVIDE GAS DISTRIBUTION COST DATA**

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Date: November 5, 2025

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On September 24, 2025, the Administrative Law Judge issued the Ruling Directing Gas Utilities to Provide Gas Distribution Cost Data (Ruling). Pursuant to the Ruling, Southwest Gas hereby produces its responsive information which is attached hereto as Attachment A and available for download on its SB 1221 (Rulemaking 24-09-012) webpage at: <https://www.swgas.com/en/california-rates-and-regulation>. The Ruling directed cost data information related to the following categories: (1) Distribution Replacement Costs; (2) Regulator Station Replacement Costs; and (3) Maintenance Costs. Southwest Gas is not providing Regulator Station Replacement Costs as Southwest Gas does not have a Regulator Station replacement program in its General Rate Case.

Moreover, Southwest Gas concurrently submitted a Motion for Leave to File Under Seal Certain Distribution Replacement Cost Data. Consequently, a public and non-public version of the Distribution Replacement Cost data exists. Southwest Gas does not make any confidentiality claim with respect to the Maintenance Cost data. The link above provides the public version of the data available in MS Excel format.

Respectfully submitted this 5th day of November 2025

SOUTHWEST GAS CORPORATION

A handwritten signature in black ink, appearing to read 'V. Vitatoe', is written over a horizontal line.

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Attachment A

Southwest Gas Distribution Replacement Costs Data - Summary - Table A

Row ID	Program Category	Row Name	Value	Definition
A1	Main and service replacement programs	<i>Cost per service, for main programs</i>	\$ 18,289	Average cost of gas distribution main and service replacement activities, per service. Also shown in next table, row B8, final column.
A2	Service-only replacement programs	<i>Cost per service replaced, for services only</i>	\$ 138,786	Average cost of replacing gas distribution services only.[1] Also shown in next table, row B1, final column.
A3	Main and service replacement programs	Cost per main mile replaced	\$ 616,036	Average cost of gas distribution main and service replacement activities, per mile of main. Also shown in next table, row B9, final column.
A4	Main and service replacement programs	Services per project, for main programs	19	Average number of services in a single work order. Also shown in next table, row B10, final column.
A5	Main and service replacement programs	Main program projects per year	29	Average work orders per year, totaled across the utility's main and service replacement programs. Also shown in next table, row B11, final column.
A6	Service-only replacement programs	Services replaced per year, when services only	0.86	Average number of services replaced by service-only replacement programs.[2] Also shown in next table, row B3, final column.
A7	Both main and service- and service-only replacement programs	Annual pipeline replacement expenditures	\$ ██████████	Total cost across gas distribution replacement programs. Sum of next table's B5 and B15, final column.

Southwest Gas Distribution Replacement Costs Data - Summary - Table A

Row ID	Program Category	Row Name	Value	Definition
A8	NA	<i>Maintenance cost per service</i>	\$ 30.00	Average cost of gas distribution pipeline maintenance, per service, not including replacement costs. Also shown in later table, cell G1.
A9	Main and service replacement programs	<i>Project planning period, for main programs</i>	*NA	Average days between the date that the project was identified for replacement and the date that replacement activities broke ground. Also shown in next table, row B23, final column.
A10	Service-only replacement programs	<i>Project planning period, for services only</i>	*NA	Average days between the date that the service(s) was identified for replacement and the date that replacement activities broke ground. Also shown in next table, row B6, final column.

[1] Programs which replace both mains and services sometimes replace services alone, but including those projects would be more challenging to include in this calculation.

[2] Note this will be less than the total services replaced annually because mains and services programs can also include projects which only replace services. However, it would be more challenging to include those in this calculation.

*Southwest Gas does not track broke ground date.

Row ID	Program Category	Row Name	Definition	Barstow District 011	Victorville District 012	Big Bear District 013	North Tahoe District 014	Truckee District 015	South Lake Tahoe District 016	Needles District 019	Totals or Averages Across All Operating Districts	Notes
B1	Service-only replacement programs	Cost per service replaced, for services only	Average cost of replacing gas distribution services only [1] Calculated by dividing B5 by B3.	\$0	\$ 285,512	\$0	\$0	\$ 206,669	\$ 479,521	\$0	\$138,786	\$0 values are due to no work being done over the 2021-2024 years
B2	Service-only replacement programs	Cost per service mile replaced, for services only	Average cost of service-only replacement activities, per mile of main. Calculated by dividing B5 by B4.	\$0	\$ 26,447,446	\$0	\$0	\$ 4,982,704	\$ 2,195,937	\$0	\$4,803,727	
B3	Service-only replacement programs	Services replaced per year, when services only	Average number of services replaced by service-only replacement programs [2]	0	3	0	0	1	2	0	0.86	Note: Number of services post work is greater than number of services pre-work. This programs replaces the single Master Meter to the school by running multiple services to each building.
B4	Service-only replacement programs	Service miles replaced, when services only	Total miles of service replaced by service-only replacement programs.	0.00	0.03	0.00	0.00	0.04	0.44	0.00	0.51	
B5	Service-only replacement programs	Total costs, for service-only replacement programs	Total costs of service-only replacement programs. Calculated by summing costs for service-only replacement program work orders using program work orders using cost definitions for the four cost groups "Internal Labor and Related Costs," "External Labor and Related Costs," "Materials," and "Other Misc Costs."	\$	\$	\$0	\$0	\$	\$	\$0	\$	* [CONFIDENTIAL] NOTE: Cost for District 11 occurred in 2024 with construction occurring in 2025.
B6	Service-only replacement programs	Project planning period, for services only	Average days between the date that the service(s) was identified for replacement and the date that replacement activities broke ground.	*NA	*NA	*NA	*NA	*NA	*NA	*NA	*NA	
B7	Service-only replacement programs	Project time to completion, for services only	Average days between the date that the project was identified for replacement and the date that the replaced service(s) was placed in operation.	0	26	0	0	379	429	0	119	
[skip row]												
B8	Main and service replacement programs	Cost per service, for main programs	Average cost of gas distribution main and service replacement activities, per mile of main. Calculated by dividing B15 by B12.	\$ 23,802	\$ 12,777	\$0	\$0	\$0	\$0	\$0	\$ 18,289	\$0 values are due to no work being done over the 2021-2024 years
B9	Main and service replacement programs	Cost per main service mile replaced	Average cost of gas distribution main and service replacement activities, per mile of main. Calculated by dividing B15 by B13.	\$ 447,191	\$ 784,881	\$0	\$0	\$0	\$0	\$0	\$ 616,036	\$0 values are due to no work being done over the 2021-2024 years
B10	Main and service replacement programs	Services per project, for main programs	Average number of services in a single work order. Calculated by dividing B12 by B11.	8	29	0	0	0	0	0	19	
B11	Main and service replacement programs	Main program service projects per year	Average work orders per year, totaled across the utility's main and service replacement programs.	8	50	0	0	0	0	0	29	
B12	Main and service replacement programs	Services addressed by main programs	Total services connected to mains replaced by main and service replacement programs, whether or not the service was replaced by the project.	68	1458	0	0	0	0	0	1526	

Row ID	Program Category	Row Name	Definition	Barstow District 011	Victorville District 012	Big Bear District 013	North Tahoe District 014	Truckee District 015	South Lake Tahoe District 016	Needles District 019	Totals or Averages Across All Operating Districts	Notes
B13	Main and service replacement programs	Main miles replaced	Total miles of main replaced by main and service replacement program work orders.	3,633	23,727	0	0	0	0	0	27,360	
B14	Main and service replacement programs	Service miles replaced, for main programs	Total miles of service replaced by main and service replacement program work orders.	1,021	15,904	0	0	0	0	0	16,925	
B15	Main and service replacement programs	Total costs, for main programs	Total costs of main and service replacement program work orders. Calculated by summing B17, B18, B19 and B20.	[REDACTED]	[REDACTED]	[REDACTED]	\$0	\$0	\$0	\$0	[REDACTED]	[CONFIDENTIAL]
B16	Main and service replacement programs	Cost Group										
B17	Main and service replacement programs	Internal Labor and Related Costs	Sum of salaries of utility employees; benefits (health, retirement, disability, etc.) associated with utility employee labor; employee travel costs, including meals, lodging, mileage, per diem, incidentals, and any other travel costs; and payroll taxes.	[REDACTED]	[REDACTED]	[REDACTED]	\$0	\$0	\$0	\$0	[REDACTED]	[CONFIDENTIAL]
B18	Main and service replacement programs	External Labor and Related Costs	Combine "external labor" and contracts costs. Includes contracts for services and for employees. Include equipment rental here.	[REDACTED]	[REDACTED]	[REDACTED]	\$0	\$0	\$0	\$0	[REDACTED]	[CONFIDENTIAL]
B19	Main and service replacement programs	Materials	Cost of pipe, valves, fittings, regulators, and other materials installed at the project.	[REDACTED]	[REDACTED]	[REDACTED]	\$0	\$0	\$0	\$0	[REDACTED]	[CONFIDENTIAL]
B22	Main and service replacement programs	Other Misc Costs	Sum of costs in the cost categories "Elect," "Permitting," "AFUDC," "Land," "Other," and "Administrative & General Costs" as defined in "Definitions of Other Misc Costs."	[REDACTED]	[REDACTED]	[REDACTED]	\$0	\$0	\$0	\$0	[REDACTED]	[CONFIDENTIAL]
B23	Main and service replacement programs	Project planning period, for main programs	Average days between the date that the project was identified for replacement and the date that replacement activities broke ground.	*NA	*NA	*NA	*NA	*NA	*NA	0	*NA	
B24	Main and service replacement programs	Project time to completion, for main programs	Average days between the date that the project was identified for replacement and the date that the replacement equipment was placed in operation.	159	144	0	0	0	0	0	151	

[1] Programs which replace both mains and services sometimes replace services alone, but including those projects would be erroneous to include in this calculation.

[2] Note this will be an underestimate because mains and services programs can also include projects which only replace services. However, it would be more challenging to include those in this calculation.

*Southwest Gas does not track broke ground date.

Note: Southwest Gas' Southern California Division (Victorville, Barstow, and Big Bear Districts) have replacement programs under the GRC. Averages and totals are calculated using the data from those three Districts only.)

Row ID	Program Category	Row Name	Definition	Targeted Pipe Replacement Program (IRRAM TFRP) (9636, 9605)	Totals or Averages Across All Operating Districts	Notes
C1	Main and service replacement programs	Cost per service, for main programs	Average cost of gas distribution main and service replacement activities, per service. Calculated by dividing C8 by C5.	\$12,193	\$12,193	
C2	Main and service replacement programs	Cost per main mile replaced	Average cost of gas distribution main and service replacement activities, per mile of main. Calculated by dividing C8 by C6.	\$410,691	\$410,691	
C3	Main and service replacement programs	Services per project, for main programs	Average number of services in a single work order. Calculated by dividing C5 by C4.	13	13	
C4	Main and service replacement programs	Main program projects per year	Average work orders per year, totalled across the utility's main and service replacement programs.	58	58	
C5	Main and service replacement programs	Services addressed by main programs	Total services connected to mains replaced by main and service replacement programs, whether or not the service was replaced by the project.	1526	1526	
C6	Main and service replacement programs	Main miles replaced	Total miles of main replaced by main and service replacement program work orders.	27,360	27,360	
C7	Main and service replacement programs	Service miles replaced, for main programs	Total miles of service replaced by main and service replacement program work orders.	16,925	16,925	
C8	Main and service replacement programs	Total costs, for main programs	Total costs of main and service replacement program work orders. Calculated by summing C9, C10, C11, and C12.	█	█	* [CONFIDENTIAL]
	Main and service replacement programs	Cost Group				
C9	Main and service replacement programs	Internal Labor and Related Costs	Sum of salaries of utility employees; benefits (health, retirement, disability, etc.) associated with utility employee labor; employee travel costs, including meals, lodging, mileage, per diem, incidentals, and any other travel costs; and payroll taxes.	█	█	* [CONFIDENTIAL]

Note: Southwest Gas' Southern California Division (Victorville, Barstow, and Big Bear Districts) have replacement programs under the GRC. Averages and totals are calculated using the data from those three Districts only.)

Row ID	Program Category	Row Name	Definition	Targeted Pipe Replacement Program (IRRAM TFRP) (9636, 9605)	Totals or Averages Across All Operating Districts	Notes
C10	Main and service replacement programs	External Labor and Related Costs	Combine "external labor" and contracts costs. Includes services and for employees. Include equipment rental here.	[REDACTED]	[REDACTED]	* [CONFIDENTIAL]
C11	Main and service replacement programs	Materials	Cost of pipe, valves, fittings, regulators, and other materials installed at the project.	[REDACTED]	[REDACTED]	* [CONFIDENTIAL]
C12	Main and service replacement programs	Other Misc Costs	Sum of costs in the cost categories "Fleet," "Permitting," "AFUDC," "Land," "Other," and "Administrative & General Costs" as defined in "Definitions of Other Misc Costs."	[REDACTED]	[REDACTED]	* [CONFIDENTIAL]
C13	Main and service replacement programs	Costs Excluded from Budget Code	Include any and all costs that are recorded within C9, C10, C11 or C12 and are not recorded within the program's budget code for rate case purposes. For example, this may include field capital support for some utilities. Thus, this total, if not zero, will overlap with the cost categories shown above.	\$0	\$0	All costs are recored in C9, C10, C11, C12. Thus total is zero.
C14	Main and service replacement programs	Project planning period, for main programs	Average days between the date that the project was identified for replacement and the date that replacement activities broke ground.	*NA	*NA	
C15	Main and service replacement programs	Project time to completion, for main programs	Average days between the date that the project was identified for replacement and the date that the replacement equipment was placed in operation.	101	101	

[1] Programs which replace both mains and services sometimes replace services alone, but including those projects would be onerous to include in this calculation.

[2] Note this will be an undercount because mains and services programs can also include projects which only replace services. However, it would be more challenging to include those in this calculation.

*Southwest Gas does not track broke ground date.

Southwest Gas Maintenance Costs - Distribution Pipelines - Table G

Row ID	Row Name	Value	Definition	General Rate Case Citation (document and page number)	Notes
G1	<i>Maintenance cost per service</i>	\$30	Average cost of gas distribution pipeline maintenance, per service. Calculated by adding (Row IDs) G3 and G4, then dividing by G2.	NA	
G2	Services	185,631	Number of services operated by the utility.	NA	
G3	Total capital maintenance costs	\$0.00*	Annual capital cost of all gas distribution main and service leak detection and prevention, maintenance, and repairs, <i>excluding</i> pipeline replacement.	NA	* Southwest Gas does not have a way of breaking out the information requested in this cell.
G4	Total O&M maintenance costs	\$ 5,555,117	Annual operations and maintenance cost of all gas distribution main and service leak detection and prevention, maintenance, and repairs, <i>excluding</i> pipeline replacement.	NA	

Southwest Gas Maintenance Costs - Medium-Pressure Regulator Stations - Table H

Row ID	Row Name	Value	Definition	General Rate Case Citation (document and page number)	Notes
H1	<i>Maintenance cost per regulator station</i>	\$1,293	Average cost of maintaining gas distribution medium-pressure regulator stations, per service. Calculated by adding (Row IDs) H3 and H4, then dividing by H2.	NA	
H2	Regulator stations	255	Number of gas distribution regulator stations operated by the utility. Include only the medium-pressure stations included in the F4 total.	NA	Southwest Gas does not have a Regulator Replacement Program in its GRC. The total provide is for all Southwest Gas Regulator Stations in its California Service Territory.
H3	Total capital maintenance costs	\$0.00*	Annual capital cost of all medium-pressure gas distribution regulator station leak detection and prevention, maintenance, and repairs, <i>excluding</i> station replacement.	NA	* Southwest Gas does not have a way of breaking out the information requested in this cell.
H4	Total O&M maintenance costs	\$329,594	Annual operations and maintenance cost of all medium-pressure gas distribution regulator station leak detection and prevention, maintenance, and repairs, <i>excluding</i> station replacement.	NA	