



SOUTHWEST GAS CORPORATION

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January 29, 2021

Executive Division
California Public Utilities Commission
Room 5220
505 Van Ness Avenue
San Francisco, CA 94102

Re: Reply Comments of Southwest Gas Corporation on Draft Resolution M-4849 Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections

Dear Executive Division:

Pursuant to Rule 14.5 of the Rules of Practice and Procedure (Rules) of the California Public Utilities Commission (Commission), Southwest Gas Corporation (Southwest Gas or Company) hereby submits its reply comments on Draft Resolution M-4849 (Draft Resolution), issued January 15, 2021, which extends the customer protections adopted in Resolution M-4842 through June 30, 2021 and requires utilities to submit transition plans detailing how they will prepare customers for the expiration of the customer protections. Southwest Gas supports the Commission's continued efforts to assist residential and small business customers in response to the COVID-19 pandemic.

Southwest Gas submits these reply comments to address and clarify an issue raised in comments to the Draft Resolution filed jointly by the Utility Reform Network, National Consumer Law Center, and Center for Accessible Technology (Joint Consumers).¹ Specifically, the Company is concerned that modifications to the Draft Resolution as proposed by the Joint Consumers could be interpreted to impose a mandatory requirement for increased frequency of data sharing with water utilities on accounts enrolled in income-eligible programs as applicable to all energy investor owned utilities (IOUs) operating in California, including small and multi-jurisdictional utilities (SMJUs) such as Southwest Gas. To the extent advocated by the Joint Consumers, Southwest Gas opposes a requirement mandating the Company to increase the frequency of its data exchanges with water utilities. As reflected in comments recently filed by

¹ See Comments of the Utility Reform Network, National Consumer Law Center, and Center for Accessible Technology on Draft Resolution M-4849, submitted January 21, 2021.



Southwest Gas in Rulemaking 17-06-024,² increased frequency of data sharing is not feasible nor cost-effective for implementation by the Company at this time.

The Joint Consumers state in their comments:

“Joint Consumers note that the Draft Resolution recommends that the utilities consider ‘increasing the frequency of energy and water IOUs exchange data on accounts enrolled in income-eligible programs so that customers can be targeted for enrollment.’ While Joint Consumers are in full support of this recommendation as a good practice, we think it is important to note that in R.17-06-024, the Class A water utilities and their energy utility counterparts held meet and confer sessions on the low-income data exchange process and reported back to the Commission that these water and energy utilities could accommodate more frequent data exchanges with a maximum frequency of once a quarter.^[fn] This Agreement should be reflected in the Draft Resolution and the water and energy IOUs should be directed to implement it at this time as part of these Transition Plans.”³

While the Joint Consumers’ recommendation for modification of the Draft Resolution to require more frequent data sharing with water utilities may be referring only to those large energy IOUs that have indicated an ability to accommodate such changes, the comments could be interpreted as applying to all water and energy IOUs. Requiring more frequent data exchanges between water utilities and all energy IOUs would present significant challenges for Southwest Gas.

Southwest Gas is a natural gas local distribution company serving approximately 200,000 customers in California, and one of six California SMJUs. As an SMJU, the Company’s service territories, customer base, and program budgets in California are significantly smaller than those of the larger energy IOUs. While more frequent data exchanges between energy and water utilities may be possible for some of the larger energy IOUs, the Company would face significant obstacles in implementing such changes. Southwest Gas currently exchanges California Alternate Rates for Energy participant data twice a year with two water utilities that have overlapping service territories: Golden State Water Company (Golden State) and Liberty Utilities (Apple Valley Ranchos Water) Corp. (Liberty). Increasing the frequency of data exchanges with Golden State and Liberty would necessitate various system modifications,

² See Comments of Southwest Gas Corporation (U 905 G) in Response to Administrative Law Judge’s Ruling Directing Parties to File and Serve Comments on Water Division Staff Report, filed December 23, 2020 (Docket R.17-06-024).

³ See Comments of Joint Consumers on Draft Resolution M-4849, at 8-9.



including significant technical and administrative improvements. In addition, the Company's program budget does not include funding to implement the required modifications, nor is the required funding contemplated in the Company's pending Energy Savings Assistance and CARE Program and Budget Application for Program Years 2021-2026.⁴ While the Company does not oppose and in fact encourages strategies that enhance data sharing, increasing the frequency of data exchanges is not practicable for all energy IOUs.

Accordingly, and to the extent that the Joint Consumers' comments are so interpreted, Southwest Gas opposes a modification to the Draft Resolution that imposes upon all energy utilities a mandated increase in the frequency of data exchanges with water utilities on accounts enrolled in income-eligible programs. Such a requirement is not cost-effective or feasible for Southwest Gas and should not be mandated for all energy IOUs.

Southwest Gas appreciates the opportunity to submit these reply comments.

Respectfully submitted,

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⁴ See Application of Southwest Gas Corporation (U905G) for Approval of Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2021-2026 (A.20-05-017; consolidated proceeding A.20-03-014 et al.).