



SOUTHWEST GAS CORPORATION

March 27, 2020

via Electronic Mail

Mr. Leslie Palmer, Director
Safety and Enforcement Division
leslie.palmer@cpuc.ca.gov
California Public Utilities Commission
505 Van Ness Avenue,
San Francisco, California 94102

RE: Southwest Gas Corporation Business Continuity and COVID-19 (Novel Coronavirus) Response Plan

Dear Mr. Palmer:

Southwest Gas Corporation (Southwest Gas or Company) is in receipt of the March 20, 2020 letter from Executive Director Alice Stebbins concerning the energy utilities Business Continuity response plan for COVID-19. Southwest Gas appreciates this opportunity to respond.

Southwest Gas understands that these are unprecedented times for everyone and remains committed to providing safe and reliable natural gas service to our approximately 200,000 customers in California. As the United States and our local communities ramp up efforts to limit the spread of COVID-19, Southwest Gas is monitoring this situation closely and is acting to protect its employees and customers who are of utmost importance.

On March 19, 2020, Governor Newsom issued an Executive Order directing all California residents to heed state public health directives, including the order for all individuals living in the state to stay home or at their place of residence except as needed to maintain continuity of operations at the federal critical infrastructure sectors ("Stay at Home" order). Thus, Southwest Gas customers will depend on the Company even more to continue to deliver clean and efficient natural gas to their homes.

Since the beginning of March, Southwest Gas' Executive Crisis Management Team (ECMT) has been meeting regularly regarding the COVID-19 emergency to discuss updates and address any issues that may arise. Southwest Gas also recently established a COVID-19 Task Force that meets daily and has been reviewing information provided by national, regional, and local stakeholders. The Task Force is closely monitoring the current situation in the areas in which we operate. Southwest Gas staff work closely with peer utilities through the American Gas Association and following guidance from the Centers for Disease Control and Prevention (CDC), U.S. Occupational Health and Safety Administration and other state and local health organizations in implementing best practices to ensure the safety of both our employees and our customers. The COVID-19



Task Force provides daily debriefs to the ECMT to keep them apprised of recent developments and initiatives being addressed by the COVID-19 Task Force.

Southwest Gas' Business Continuity Program (Program) serves as a tool for the actions required during, or immediately following an emergency or incident that threatens to disrupt normal business activities. The Program will ensure the continuation of business-critical processes by minimizing the impact of a business interruption to employees, facilities, services, systems, and resources. Each Southwest Gas business unit has a business continuity plan as part of the Program. These plans are exercised and/or updated on an annual basis and as discussed above, they have been reviewed and are ready to be fully implemented as needed in response to the COVID-19 declared emergency.

Southwest Gas provides the following additional information in response to the questions posed in Executive Director Stebbins' letter concerning its Business Continuity Plans:

- *Which essential functions can and cannot be performed remotely or transferred between locations;*

Southwest Gas Business Continuity Plans are designed to allow business operations to continue to be performed regardless of circumstances that may have an adverse impact. These plans are designed to identify alternative work solutions, work flows, and work processes. Although many employees are telecommuting, Southwest Gas Business Continuity Plans have allowed the Company to maintain its normal operations with minimal impact. Many of Southwest Gas essential functions have transitioned to telecommuting for work, including departments such as Accounting, Human Resources, Legal Affairs, Regulation and Energy Efficiency, and Risk Management. Departments that are generally unable to work remotely are Field and Gas Operations.

Southwest Gas is focused on ensuring that our Field and Gas Operation employees are safe while performing their critical job functions. Risk Management and Occupational Health and Safety are continuously working on providing up-to-date information on the best practices identified by the CDC and peer companies on how to best limit exposure. Gas Operations has also enacted protocols to limit exposure.

- *How your company responds when employees are unable to work at their assigned job sites;*

As mentioned above, the majority of Southwest Gas office employees who are able to work from home are currently telecommuting for work. Also, almost all field employees start and end their days from their homes. Southwest Gas has not experienced a reduction in response or productivity as a result of this work practice.

Further, Gas Control and Dispatch Staff has a "hot site" (an offsite location that has a similar set up with the same technology and office equipment as the onsite location) available to them if their primary location becomes compromised. The team can



transition flawlessly to the secondary site and continue complete command of Southwest Gas' distribution system.

- *How your company is responding to shelter in place orders, including for employees whose homes or job sites are in locations where such orders are in effect;*

Although Governor Newsom issued a "Stay at Home" order, as an essential business, Southwest Gas is permitted to remain open. However, as discussed herein employees have been instructed to telecommute whenever possible and for those employees who either remain in the office or out in the field, Southwest Gas has provided guidance and personal protective equipment (PPE) consistent with the CDC to prevent the spread of COVID-19.

- *Whether continuity planning differs for pandemics versus events such as earthquakes or wildfires; and*

Southwest Gas' Business Continuity Plans are not designed for specific types of emergency events. Instead they are designed to be adaptable to any situation that may pose a threat to normal business operations. Yet, plans are tested based on various events and scenarios such as pandemics, natural disasters, etc.

- *Whether your company has already activated your business continuity plan in response to COVID-19.*

Certain aspects of Southwest Gas' Business Continuity Plans, i.e., telecommuting, have been activated as a response to COVID-19, such as the Corporate Crisis Management Team. Activation of some plans is to ensure that Southwest Gas can continue to operate with minimal impact to operations.

Communications Distributed to Southwest Gas Employees and Customers About Impacts to Operations and Service in Relation to COVID-19 Response

Southwest Gas Employees Communications

Southwest Gas has been communicating regularly with its employees, including the implementation of a COVID-19 webpage on the Company's internal infonet website, "Coronavirus Company Updates". This infonet site contains internal and external resource links, including health tips and links to various federal, state and county health organization, and employee Frequently Asked Questions (FAQs). Additionally, multiple employee communications have been distributed, which include:

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Date	Communication Title*
January 30, 2020	<i>A Word About the Coronavirus & Healthy Reminders</i>
March 2, 2020	<i>The Coronavirus, Company, Preparedness & What You Can Do</i>
March 9, 2020	<i>Business Continuity Plan Refresher Meetings Scheduled This Week</i>
March 13, 2020	<i>CEO Message Regarding Coronavirus and Policy Changes</i>
March 16, 2020	<i>CEO Message Regarding Coronavirus and New Protocols</i>
March 16, 2020	<i>Coronavirus Update – Guidance for Field Employees</i>
March 18, 2020	<i>CEO Communication Regarding Business Operations</i>
March 19, 2020	<i>COVID-19 and Health Plan Changes</i>
March 23, 2020	<i>Protective Measures Against Coronavirus</i>
March 27, 2020	<i>CEO Message: Providing an Essential Service</i>

*Bolded titles are samples provided in Attachment A.

Southwest Gas Customer Communications

Southwest Gas developed a dedicated COVID-19 webpage on its external website at www.swgas.com/en/covid19. The webpage contains a message from Southwest Gas President and Chief Executive Officer, John P. Hester, links to media statements and FAQs. Southwest Gas also has a dedicated webpage concerning the California Emergency Disaster Relief Program (EDRP) customer protections at www.swgas.com/edrp. A dedicated notification concerning the EDRP customer protections applicable to the COVID-19 declared emergency will be posted to the EDRP webpage. The EDRP customer protections are further discussed below.

In addition, Southwest Gas has provided multiple communications to the public regarding its operations and other helpful information in relation to the COVID-19 declared emergency. These communications are provided through email blasts, press releases, media statements, social media platforms. Two samples of the customer email blasts are provided as Attachment B.

Southwest Gas provides responses to the following additional questions posed in Executive Director Stebbins' letter:

- *Has your company implemented the Centers for Disease Control and Prevention (CDC) interim guidance?*

Southwest Gas is actively providing our employees with the most current and relevant information with respect to COVID-19 and is actively monitoring the CDC's guidance as well as the World Health Organization (WHO) information. Consistent with the CDC's interim guidance, the following guidelines have been implemented companywide:

- Cleaning hands often either by washing your hands with soap and water for at least 20 seconds or the use of a hand sanitizer that contains at least 60% alcohol;



- Avoid close contact (social distancing); and
- Directing employees to stay home if they are sick.

In addition to implementing best practices and following guidance provided by the CDC, our local health organizations, and the American Gas Association (AGA), Southwest Gas is implementing additional precautions companywide. These precautions are in place through at least May 15, 2020, and include:

- Use of teleconference meetings in lieu of in-person meetings;
- Elimination of non-essential business travel, only essential travel is being considered and requires officer approval;
- Limitation of visits with external parties at Southwest Gas offices;
- Postponement of large internal meetings and employee events;
- Work from home or self-isolation requirements for any employees returning from overseas vacations;
- Implementation of enhanced sanitization protocols for buildings companywide.

Additionally, Southwest Gas developed and distributed a list of protective measures for field employees to utilize when entering a customer's home or business to protect themselves, and our customers, from the spread of COVID-19 (reference Attachment C). Southwest Gas field employees, i.e., service technicians, will continue to interface with customers as needed to ensure natural gas service is being delivered safely and securely. Service technicians have been directed to practice social distancing, maintaining at least 6 feet of distance between themselves and customers and will forego handshakes, as well as not requiring customer signatures on paperwork. Service technicians are required to wear protective nitrile gloves and safety glasses when conducting business inside a customer's home or business. In addition, service technicians are being provided additional PPE such as, customer care booties, and hand sanitizer as well as a solution to be used to disinfect all tools that were used between service calls. When working on a service order involving a confirmed or suspected case of COVID-19, service technicians will consult with their supervisors and may use an N95 respirator on an optional, voluntary basis. Training on proper use and fit of N95 respirators is available on Southwest Gas' Learning Management System. A copy of the guidance on voluntary N95 respirator use is provided as Attachment D.

Southwest Gas recognizes that a key method to prevent the spread of COVID-19 is having employees telecommute. This effort helps limit employees' interaction with co-workers and aligns with the CDC's recommendation of social distancing. Southwest Gas has informed its employees to telecommute if at all possible to limit the number of employees in Southwest Gas offices.

- *What effects might the spread of COVID-19 have on your call center?*

Southwest Gas Call Center staff is distributed among nine locations (two are back office locations), which range in number of employees of approximately 20 to 60



employees at each location. Therefore, should one location need to close due to the spread of COVID-19, the call volume at that location will be virtually routed to the other locations. To support the overflow locations, Southwest Gas would offer overtime, a reduction of paid time off allotments and add support staff and Back Office personnel to assist in answering calls. Southwest Gas would also provide up-front messaging on the Interactive Voice Response (IVR) line, its web site and social media to alert customers regarding high call volumes and potential long hold times. Although Southwest Gas has limited technology capabilities for all Call Center employees to telecommute, should the need arise to vacate all offices, Southwest Gas is equipped to provide an adequate number of employees to work from home to maintain emergency and turn on/off call volumes.

To help prevent the spread of COVID-19 at each Call Center locations, Southwest Gas has taken precautions with social distancing by arranging employees so that there are at least one or two empty desks in between the employees. Also, all Call Center locations are sanitized regularly.

- *What effects might the spread of COVID-19 have on your credit and collections processes?*

Similar to the Call Centers, Southwest Gas has taken precautions with social distancing and sanitizing the Credit and Billing Operations (CABO) office sites, which are located at the Southern California Division Office in Victorville, California and the Northern Nevada Division Office in Carson City, Nevada. If either CABO site were to be impacted by the spread of COVID-19, Southwest Gas would send work electronically to either Victorville or Carson City based upon the site impacted. In addition, Southwest Gas has prioritized all reporting by customer impact and would only process the high impact/regulatory required exceptions and defer any low impact/non-urgent work until a later date. Similar to limited telecommuting capabilities for Call Centers, Southwest Gas has limited telecommuting capabilities for its CABO sites. However, should a CABO site need to be vacated, Southwest Gas is equipped to provide for an adequate number of employees to work from home to maintain limited processing of regulatory required exceptions.

- *Have you taken any actions or are you planning any actions for customers impacted by COVID-19, such as suspending disconnections or implementing bill payment plans?*

Southwest Gas implemented its EDRP customer protections, which includes the suspensions of disconnections for non-payment for all customers (residential and non-residential), waiver of deposits and late payment fees, flexible payments plans and suspension of removals from the California Alternate Rates for Energy bill discount program. These protections are effective consistent with the March 4, 2020 State of Emergency Declaration by Governor Newsom and will remain in effect until at least March 4, 2021. Southwest Gas Advice Letter No. 1130 submitted to the Commission's Energy Division describes in detail the applicable customer protections. A copy of the Advice Letter is provided as Attachment E.



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- *How will you communicate to the public about COVID-19 and your operations?*

Please reference Southwest Gas' discussion above concerning its customer communications regarding COVID-19.

Southwest Gas will continue to provide safe, reliable and affordable service to its California customers while keeping its employees safe during this crisis. Southwest Gas believes the planning and preparation of business continuity related matters have prepared the Company and its employees to work through these challenging times. Southwest Gas does not currently anticipate any changes to the plans described above, but to the extent circumstances necessitate any changes or modifications, the Commission will be timely updated.

Should you have any questions, please do not hesitate to contact me at (702) 876-7323.

Respectfully,

Valerie J. Ontiveroz
Regulatory Manager/California

Attachments A through E

- c: President Marybel Batjer, CPUC
Commissioner Martha Guzman-Aceves, CPUC
Commissioner Liane M. Randolph, CPUC
Commissioner Clifford L. Rechtschaffen, CPUC
Commissioner Genevieve A. Shiroma, CPUC
Alice Stebbins, Executive Director, CPUC
Edward Randolph, Deputy Executive Director, CPUC
Maryam Ebke, Deputy Executive Director, CPUC
Lucian Filler, Deputy Executive Director, CPUC
Hazel Miranda, Office of Government Affairs Director, CPUC
Service List to R.18-03-011

ATTACHMENT A

Employee Communication Samples



January 30, 2020
Companywide

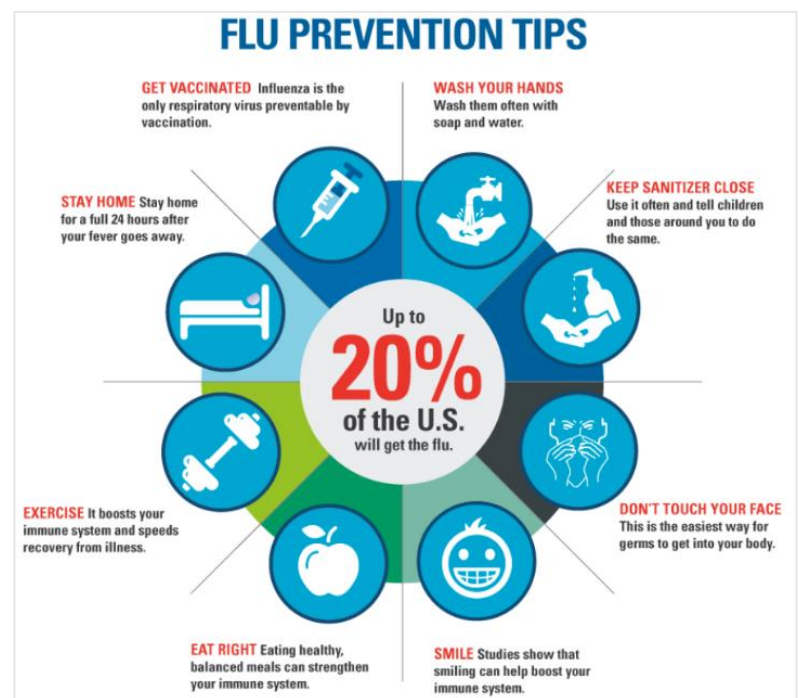
A Word About the Coronavirus & Healthy Reminders

As you may be aware, earlier this month, China and the World Health Organization (WHO) announced they had identified a new strain of the coronavirus. Coronaviruses are a large family of viruses that can cause respiratory illness such as the common cold and more severe sicknesses. Since then, there has been extensive news coverage regarding the outbreak in China of this flu-like ailment and the international efforts to contain its spread. To date, cases identified in the United States have been minimal, with one mild case confirmed in our service territory.

Agencies, such as the Southern Nevada Health District, Pima County Government and Pima County Department of Public Health, citing information provided by the Centers for Disease Control (CDC), say that the risk to the general public is considered to be low. Taking precautions to limit the spread of the new virus, which originated in China, the CDC has expanded mandatory screenings to 20 international airports in the United States. These airports, none of which are in our service territory, collectively handle about 90% of passengers arriving from China. For perspective, UNLV Medical School doctors have stated that residents are much more likely to contract "the flu" than coronavirus.

Rest assured, in the unlikely event that this virus (or some other ailment) spreads in Southwest's service territory, we have extensive business continuity plans that could and would be put in effect. Southwest Gas has also partnered with various local health agencies to be a Point of Dispensing (POD) for medications, vaccines or medical supplies to employees and their family members in the event of a public health emergency.

While the risk of an epidemic in the U.S. and in Southwest's service territory appears to be low at this time, current events are a good reminder to continue practicing the daily habits that keep us healthy as individuals and protect those around us: wash your hands frequently, use the hand sanitizers located throughout your workplace, eat your veggies, exercise, and get a good night's sleep! For more information and updates about this ongoing current event, please visit <https://www.cdc.gov/>.





March 2, 2020
Companywide

The Coronavirus, Company Preparedness & What You Can Do

As the coronavirus situation continues to develop, the Centers for Disease Control and Prevention ([CDC](#)) has provided updates and guidance. At this time, global efforts are focused on containing the spread of this virus as well as mitigating its impact. In the U.S., the federal government is working closely with state, local, tribal and territorial partners, as well as public health partners, to respond to this public health threat. Within our service territories, local agencies are providing updates on their websites and social media platforms.

As part of our overall business continuity strategy, the Corporate Crisis Management Plan (CCMP) is in place to help minimize the duration and impact of a disruptive event, such as a coronavirus pandemic. If it becomes necessary to notify our workforce of emergent information and/or special instructions, the plan will be activated, and appropriate steps will be taken to keep you informed. Initial notifications would be made via text messages to all employees who have a mobile number on file (either company-issued or personal device). Secondary notices would be communicated via email & available landline numbers.

While Southwest Gas and other agencies are taking action, individuals are also reminded to do their part. Take proactive steps to lower your risks of getting the flu or coronavirus by reinforcing healthy habits such as getting enough rest, eating well and exercising regularly.

Thank you for your attention to this matter. Helpful tips, including the use of enhanced workplace technologies, and additional resources are provided on the next page. We'll continue to provide updates as needed.

Tips for a Healthy Work Environment:

- Use enhanced technologies such as WebEx or teleconference options in place of air travel, where appropriate.
- Stay home when sick and dial into an important meeting at your discretion.
- Decline to attend group meetings or events while recovering from a cold, especially if sneezing and coughing have not subsided.
- Clean and disinfect frequently touched objects and surfaces.

Actions to help prevent the spread of respiratory viruses:

- Avoid close contact with people who are sick.
- Avoid touching your eyes, nose, and mouth with unwashed hands.
- Wash your hands often with soap and water for at least 20 seconds.
- Use alcohol-based hand sanitizer if soap and water aren't available.

Visit the SWG Employee Self-Service section in Oracle to review personal information including emergency contacts, and update as needed.



For more information, visit:

- [Arizona Department of Health Services](#)
- [Carson City Health & Human Services](#)
- [Pima County](#)
- [San Bernardino County Department of Public Health](#)
- [Southern Nevada Health District](#)
- [What to do if you are sick with coronavirus disease 2019 \(COVID-19\)](#)
- [What you need to know about coronavirus disease 2019 \(COVID-19\)](#)

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- [Southern Nevada Health District](#)
- [What to do if you are sick with coronavirus disease 2019 \(COVID-19\)](#)
- [What you need to know about coronavirus disease 2019 \(COVID-19\)](#)



March 9, 2020
Companywide

Business Continuity Plan Refresher Meetings Scheduled This Week

Ensuring the safety, health and well-being of our employees and the communities we serve is at the heart of our core values. As we continue to monitor coronavirus-related developments in the areas in which we live and work, Business Continuity Plan refresher meetings will also be scheduled companywide throughout the week.

What is the Business Continuity Plan? It's an approved set of arrangements, resources and procedures to enable departments to respond to an interruption of critical business processes and the resumption of those processes in a timely manner. The purpose of these meetings will be to revisit the plan and review actions that need to be taken if the plan is activated. This proactive step is being taken out of an abundance of caution and vigilance.

If it becomes necessary to curtail the reporting of our workforce to their usual business locations or for office personnel to work remotely, everyone will need to be aware of expectations and responsibilities. As previously noted, initial notifications of plan activation would be made via text messages to all employees who have a mobile number on file (either company-issued or personal device). Secondary notices would be communicated via email & available landline numbers. To assist with efficiency:

- All employees are reminded to log into Oracle, review their personal contact information and ensure that it's up-to-date.
- Southwesterners who have a company-issued laptop should take them home daily.
- Business Continuity team members should have a hard copy of the Plan with them at all times.

Thank you for your cooperation, flexibility and understanding during this emerging situation. We'll continue to provide updates as needed.

**In case you missed it, please see page two for important tips and resources.*

MESSAGE

From John Hester/President and CEO



March 13, 2020
Companywide

Fellow Southwesters,

I cannot stress enough that our employees' and customers' safety is of the utmost importance at Southwest Gas. As the United States and our local communities ramp up efforts to limit the spread of coronavirus, I want you to be assured that the Company is monitoring this situation closely and is making continued efforts to protect our employees and customers.

In addition to implementing best practices and following guidance provided by the Center for Disease Control, our local health organizations, as well as the American Gas Association, we are implementing additional precautions companywide. These precautions will take effect immediately, through May 15, and include more stringent guidance for Company business travel and approvals, limiting visits with external parties at Southwest Gas offices, postponing large internal meetings and Company events (including Silver Jubilee), and workplace-distancing "work from home" requirements for employees returning from overseas vacations. Companywide, we are implementing enhanced sanitization protocols for Company buildings and developing localized guidance and procedures for customer-facing staff – these will be communicated separately to those affected. As you know, the virus situation is fluid, with a rapidly developing body of science that will likely result in the implementation of increased protective measures at Southwest Gas and other employers over the coming weeks, as warranted. As part of our continued communication efforts regarding coronavirus, we'll be regularly updating the new [Coronavirus Company Updates](#) section of the InfoNet.

I'm sure you're well aware that we provide a critical energy source for our communities. During this time of heightened health awareness where customers are likely to stay home more, they will depend on us even more to continue to deliver clean and efficient natural gas to their homes. Again, I want to express my sincerest appreciation for your continued dedication to providing our over two million customers safe, reliable and affordable natural gas service with excellent customer satisfaction.

Thank you,

MESSAGE

From John Hester/President and CEO



March 16, 2020
Companywide

Dear Southwesters,

As foreshadowed in my message to you just this past Friday, the coronavirus situation continues to evolve, with new guidance provided by Federal and state officials in the past 24 hours. My number one priority is the health of you and your family, as well as that of our customers. As your CEO, I've worked with our management team to establish protocols that will better protect your health. In implementing the protocols below, it's my hope that we can also do our part to aid the nation's efforts to contain and defeat coronavirus.

On-site work and Telecommuting

- Beginning tomorrow, your supervisor will be working with you to discuss whether you are able to perform your job duties from home, and if so, discuss the expectations and arrangements required. When working from home, you must be available during business hours.
- If you're not able to perform your job duties remotely, you'll still be required to report to the office.
- For employees who are required to work from the office, please be assured that measures will be taken at company facilities to ensure your well-being is safeguarded.
- If you're required to come to work at the office but need time to make childcare or other arrangements, please work with your supervisor as additional time may be provided.

Travel restrictions

- Non-essential work travel is prohibited.
- When travel is absolutely necessary, your functional Vice President will be required to approve such travel.
- If you plan on traveling internationally or go on a cruise for vacation, please notify Human Resources before your departure. There will be a mandatory 14-day self-isolation period before you can return to work.

Enhanced field precautions

- While at customer's property, wear new disposable gloves and company-issued safety glasses at all times.
- Practice social distancing, including no handshakes and maintain at least 6 feet distance.
- Customer signatures are no longer required.
- Utilize the talking points provided earlier today when interacting with customers and consult your supervisor should you have any questions.

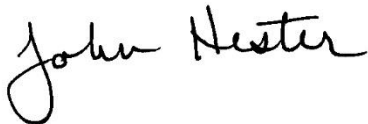
Large meetings and company events

- Previously scheduled internal meetings and Company-sponsored events, such as service awards dinners, Silver Jubilee, larger management meetings, and other events, especially those requiring travel, are postponed until later this summer or fall.
- Limit group meetings to no more than ten participants and use tele- or video-conferencing technologies instead.
- Outside visitors to company facilities are discouraged. Please use tele- or video-conferencing technologies instead.

I would like you to please take the necessary precautions recommended by medical experts: wash your hands with soap and water frequently; don't touch your face with your hands; practice social distancing by keeping 6 feet away from others; avoid being part of large groups; and if you feel sick, stay at home.

Our customers are relying on us to provide our valued energy service to them now more than ever before. As our customers spend more time at home, they need our team to ensure that safe, reliable, and affordable natural gas service is available to them to cook meals, heat their water and homes, and dry their clothes. Your flexibility in adopting the above operational practices will ensure that we continue to provide the excellent service our customers have come to expect, while protecting the health of Southwesterners, our families, and our customers.

I sincerely thank you for your dedicated service to our 2 million customers across Arizona, California, and Nevada.

A handwritten signature in black ink that reads "John Hester". The signature is written in a cursive, flowing style with a large initial "J".

MESSAGE

From John Hester/President and CEO



This is a copy of an email message sent to all employees from John Hester on March 18, 2020

Fellow Southwesters-

As you are aware from continuous media coverage, expanding coronavirus exposure has resulted in federal, state, and local officials taking dramatic actions to limit the spread of the virus. Governors across the three states in which we operate have taken actions to close schools, restaurants, bars, non-essential businesses, and houses of worship—unprecedented actions to contain the impact of a virus that is still not fully understood. The reported number of confirmed U.S. citizens infected by this virus will likely increase significantly in the coming days, as healthcare providers receive 1 million new testing kits later this week: more people getting tested result in more confirmed cases. As we've discussed before, the effective defense against this threat is fairly basic: wash your hands with soap and water religiously; don't touch your face with your hands; and stay 6 feet away from other people.

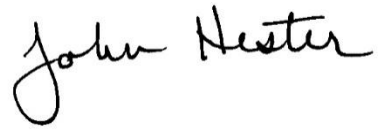
Southwest Gas, along with our friends at neighboring electric, telecom, and water utilities, plays a very important role at this time, as providers of essential utility services. While our customers can postpone plans to travel, see a movie, dine-out, or go to church for several weeks, they need reliable utility services for their families each and every day, especially as they spend more and more time at home. I appreciate and applaud your efforts to ensure our Southwest Gas customers continue receiving reliable natural gas service at their homes, as the nation works through this crisis: Southwesters play a very special role in helping our customers weather this storm.

The next several weeks are going to be tough economically—for businesses in our service territory, and across the nation. We will know friends, family members, or spouses that get impacted by the shutdown of employers from coronavirus containment efforts—hotels, restaurants, airlines, fitness centers, theaters, barber shops and more. Sometimes we may find it difficult to see the end of this, but that will come. Significant financial resources will soon be deployed by the federal government, reportedly up to \$1.2 trillion dollars, that will offer significant financial relief to people who have lost their jobs, and businesses, large and small.

So whether you are a service tech, a construction tech, a call center rep, a dispatcher, or work in an administrative support group that keeps our natural gas moving to 2 million customers across three states, thank you for your efforts to support our customers, and your co-workers. Don't forget to take a few minutes to periodically reflect on the many blessings we each personally have in our lives--as you get daily news reports on what may appear to be an ever-expanding problem. I look forward to continuing to partner with you, and support you, as we collectively work together to serve our customers, and defeat coronavirus in the coming weeks and months. I

have no doubt that we will emerge--as a company, and as a nation--stronger, more resilient, and more successful than ever before.

Thank you,

A handwritten signature in black ink that reads "John Hester". The signature is written in a cursive style, with the first letter of "John" being a large, stylized capital 'J'.

ATTACHMENT B

Customer Email Blast Samples



A MESSAGE FROM JOHN HESTER

SOUTHWEST GAS PRESIDENT AND CEO IN RESPONSE TO COVID-19

Dear Customers,

I cannot stress enough that your safety is of the utmost importance at Southwest Gas. In addition to ensuring a safe and reliable pipeline network that delivers natural gas to you, we are also taking measures to protect your well-being as we face the continued spread of the coronavirus, or COVID-19.

To that end, Southwest Gas continues to implement best practices and follow guidance provided by the Center for Disease Control, our local health organizations, as well as the American Gas Association. To give customers the peace of mind when we meet them face-to-face, we are also enhancing operational procedures for customer-facing employees like our service technicians, emergency response staff and payment office employees. These procedures include wearing gloves, not shaking hands and maintaining a reasonable distance from customers.

We understand that these are trying times for many of our customers and want to ensure that you focus on the well-being of your families without having to worry about any disruption of service from Southwest Gas. As such, we have stopped service disconnections indefinitely, until the coronavirus situation improves. For customers experiencing financial hardship, we are here to help with flexible payment options. Our website and mobile app will give you the ability to manage your account from the comfort of your home without needing to visit our payment offices in person.

We take our responsibility of providing a critical energy source for our communities very seriously. And at every step, we want to be sure that we continue to earn your trust. During this time of heightened health awareness when our customers are more likely to stay home, I want to assure you that you can continue to count on us to deliver clean, efficient, and affordable natural gas to you for cooking, heating your water and home, drying your clothes and more.

Thank you for letting Southwest Gas serve you.

Sincerely,

John Hester
President and CEO

[READ MORE](#)



CALL 811 BEFORE YOU DIG!





Southwest Gas

customerengagement@swgas.com via bluehornet.co... 3:43 PM (13 minutes ago)

☆

↩

⋮

to me ▾



WE REMAIN OPEN FOR BUSINESS

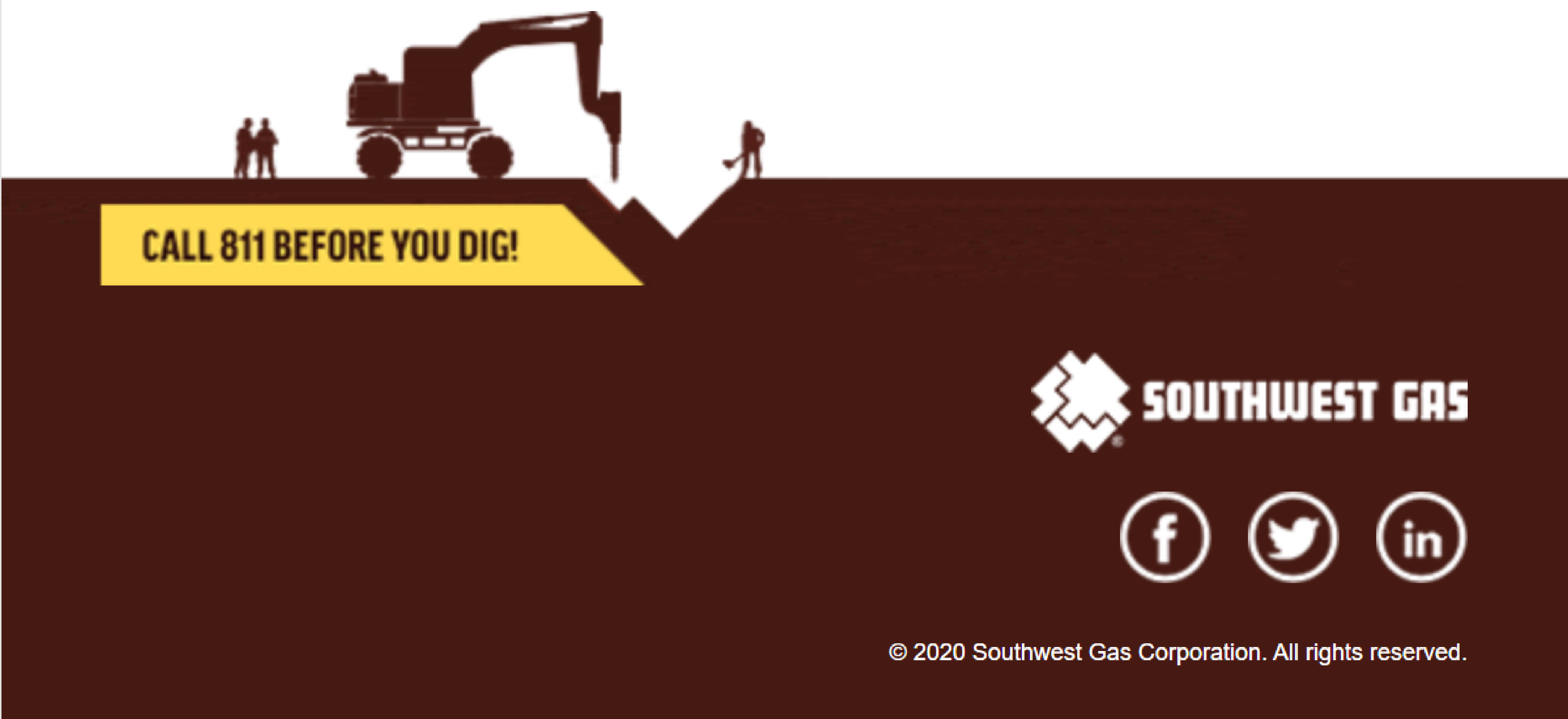
HERE TO SERVE YOU SAFE & RELIABLE NATURAL GAS

During these unprecedented times, Southwest Gas continues to be an essential part of the communities we serve. We remain committed to our two million-plus customers and will continue our normal hours of business operations during the current COVID-19 pandemic.

As a cornerstone of the community, the company provides the essential service of delivering energy to our customers, many of who are home-bound and rely on natural gas to cook, heat water and homes, and dry clothes, more now than ever before. That's why we've also ceased disconnections indefinitely, until the COVID-19 situation improves, as we know that many of our customers will be affected by recent closures. In addition, we have adopted enhanced hygiene protocols, including mandating that our technicians wear safety glasses and gloves, as well as exercise social distancing and remain at least six feet away from customers in a home or business.

We also want to remind customers that our public offices and payment kiosks remain open for customer business. Per the CDC's recommendation, no more than ten people will be allowed inside the office at once. Customers can still manage their account from the comfort of their homes using our website swgas.com and our mobile app. We also provide assistance programs for income-qualified customers.

Your Southwest Gas Family



ATTACHMENT C

“Coronavirus Update – Guidance for Field Employees”

Protective Measures Against Coronavirus (COVID-19)

(3/21/20)

The following guidance provides employees with protective measures against Coronavirus (COVID-19) when entering customer homes and businesses. These basic actions will help protect you and prevent the spread of infections, including COVID-19, in the workplace. This guidance is based on the best practice recommendations from the Centers for Disease Control and Prevention (CDC), which is subject to change.

Engage customers when you arrive onsite

Use talking points below prior to entry to engage the customer to advise them of the social distancing practices that should be followed.

- “One of the best ways to protect yourself from exposure to the new coronavirus is by maintaining at least 6 feet distance between you and others, and avoiding handshaking. Do you mind if I follow that procedure with you today?”
- “If you are feeling sick today, would you mind remaining in a room other than where I am working? This is a best practice recommendation from my company and I’d like to follow it. If you can tell me where your equipment is located, I’ll do my job and let you know when I’m done.”

Maintain social distancing in customer homes and businesses

Maintain a distance of at least 6 feet between yourself and customers at all times, if possible.

PPE

- Surgical masks are not required as they are not recommended by the CDC and will not be distributed. Company-issued respirators should only be worn if needed based on the job task.
- Before entering a customer’s premises, put on Company-issued disposable gloves to prevent touching contaminated surfaces. Remove gloves after each use and throw away.
- Company-issued safety glasses should be worn at all times while in customer’s premises. Clean safety glasses frequently with Company-approved lens/glass wipes.

Hygiene Practices

- Use alcohol-based hand sanitizer available in Company warehouses immediately before and after each customer home or business entry.
- If hand sanitizer is unavailable, wash hands using soap and water for a minimum of 20 seconds.
- Avoid touching eyes, nose and mouth. Hands touch many surfaces and can pick up viruses. Once contaminated, hands can transfer the virus to your eyes, nose or mouth.
- Practice respiratory hygiene. Cover your mouth and nose with your bent elbow or tissue when you cough or sneeze. Dispose of the used tissue immediately.

General Cleaning Guidelines

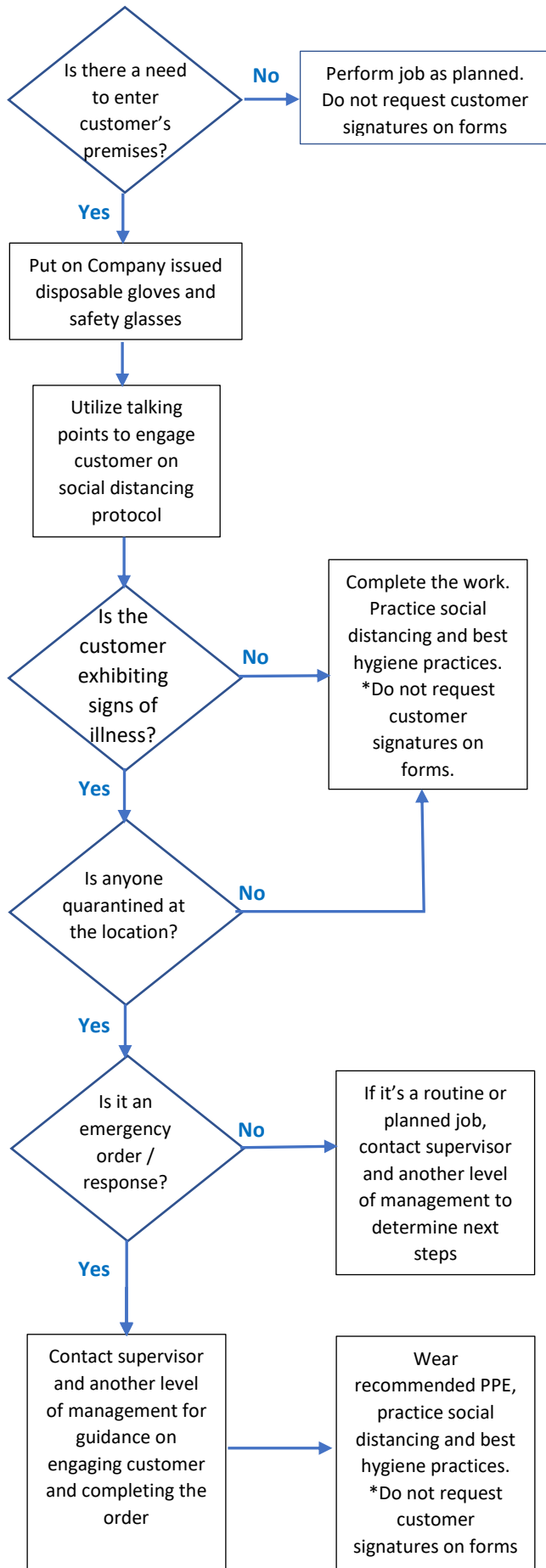
- Pay special attention to frequently touched surfaces in common areas and bathrooms. Frequently contacted items, such as drinking fountains, faucet handles, door hardware, push plates and light switches, should be wiped down regularly with cleaners.
- For vehicles, pay special attention to disinfecting surfaces and objects that are touched often, such as door handles, arm rests, steering wheel, and seatbelts, as appropriate.
- Use regular cleaning and disinfection products (e.g., Clorox wipes or sanitizer products)

Considerations for Completing Emergency Orders in a Quarantined Home/Business

- Complete the work. Practice social distancing, best hygiene practices and PPE usage as noted above.
- If the customer is un-cooperative in following or accepting our approach (i.e. social distancing, moving sick people to other rooms, etc.), then current CGI procedures should be followed.

Guidance for Field Employees Against Coronavirus (COVID-19)

3/21/20



Stop Work Program

- Notwithstanding the guidance provided in this document, each employee has the authority and responsibility to stop any task or operation where they have concerns or questions regarding the existence of a Health, Safety, or Environmental (HSE) risk.
- Employees can refer to the Stop Work Program in the Safety Manual

Talking Points for Customer Engagement on Social Distancing

Use these talking points when engaging with customer prior to entry. Maintain a distance of at least 6 feet between yourself and customers at all times, if possible.

- "One of the best ways to protect yourself from exposure to the new coronavirus is by maintaining at least 6 feet distance between you and others, and avoiding handshaking. Do you mind if I follow that procedure with you today?"
- "If you are feeling sick today, would you mind remaining in a room other than where I am working? This is a best practice recommendation from my company and I'd like to follow it. If you can tell me where your equipment is located, I'll do my job and let you know when I'm done."

Recommended PPE When Entering Customer Premises

- Surgical masks are not required and will not be distributed. Company-issued respirators should only be worn if needed based on the job task.
- Prior to entering a customer's home or business, put on disposable gloves to prevent touching contaminated surfaces. Remove gloves after each use and throw away.
- Company-issued safety glasses should be worn at all times while in customer's premises. Clean safety glasses frequently with Company-approved lens/glass wipes.

** This is a precautionary hygiene measure.
The Company is waiving the requirement for signature even if the customer is present.*

ATTACHMENT D

Voluntary N95 Respirator Use Guidance

Voluntary N95 Respirator Use

When completing an order with a confirmed or suspected case of COVID-19, discuss with your supervisor and another level of management the optional voluntary use of an N95 respirator. Note that the U.S. Centers for Disease Control and Prevention (CDC) currently recommends the use of N95 respirators only for health care professionals and certain providers of emergency medical services. As such, the Company continues to follow CDC guidelines, but recognizes that some employees may choose to wear N95 respirators on a voluntary basis in specific situations. Due to the current supply chain difficulties the Company may encounter in the event of widespread N95 respirator usage, the N95 respirators will be stored in controlled inventory and only issued with supervisor-or-above approval. Please follow Company guidelines when making decisions in these situations.

Universal Precautions – Voluntary N95 Respirator Use

The following guidelines and information are compiled from the CDC and manufacturers concerning the wearing and use of N95 respirators. Company employees who are provided an N95 respirator must have a **clean-shaven face** to ensure proper fit and seal. Additionally, employees who elect to use an N95 respirator are to contact local Risk Management so that proper OSHA-required information is recorded in LMS. While N95 respirators require fit testing, an employee can elect to wear an N95 respirator that provides lesser protection pursuant to a voluntary program. In this case, the employee need not be fit tested but **must be clean shaven** and must acknowledge in LMS that use of the respirator is voluntary and is not required by the employer, that they are not being fit tested, and that the respirator may provide lesser protection because they are not being fit tested.

N95 respirators can be reused and are considered reusable for up to **eight** hours (as a rule of thumb, one service call at a customer's home or business where there is a sick or positive COVID-19 case, equates to one hour of wear) unless other conditions develop, such as:

- The respirator becomes deformed and no longer seals or fits properly.
- The respirator becomes contaminated with dirt, with oils, or is otherwise soiled.
- The employee comes within close contact (less than 6 feet) of a person known to be sick or ill.

In these instances, it is recommended by the CDC and manufacturer that the respirator be replaced. **If an employee is provided a respirator, they are to read and follow the instructions on the product packaging and this guide.** Any N95 respirator that is provided to a Company employee will be considered reusable and voluntary use until further notice.

Donning & Doffing Instructions – Voluntary N95 Respirator Use

- Respirator should be donned prior to entering a customer's home or business.
- Hold the respirator in hand with the nosepiece at your fingertips, allowing the headbands to hang freely below your hand.
- Press the respirator firmly against your face with the nosepiece on the bridge of your nose.
- Stretch and position the top band high on the back of your head. Stretch the bottom band over the head and position it below your ears.

- Using both hands, mold the metal nosepiece to the shape of your nose.
- To test fit, cup both hands over the respirator and exhale vigorously. If air flows around your nose, tighten the nosepiece. If air leaks around the edges, reposition the straps for better fit.
- Careful observance of these fitting instructions is an important step in safe and proper respiratory use.
- Respirator should be doffed after leaving the customer's home or business.

Questions about the use and replacement of a respirator are to be directed to Corporate Safety. The following link to the CDC webpage for proper donning and doffing of an N95 respirator is provided if you have additional questions – <https://www.cdc.gov/niosh/docs/2010-133/pdfs/2010-133.pdf>.

General Information (CDC)

An N95 filtering face piece (FFP) is a type of respirator which removes particles from the air that are breathed through it. These respirators filter out at least 95% of very small (0.3 micron) particles. N95 FFPs are capable of filtering out all types of particles, including bacteria and viruses.

The respirator helps reduce exposures to certain airborne contaminants. Before use, the wearer must read and understand the *User Instructions* provided as a part of the product packaging.

Unless the manufacturer identifies a specified duration of use, for example "single use only", or the employer's respirator program excludes reuse, for example when exposed to infectious agents capable of being transmitted by contact, users can wear an FFP until it is damaged, soiled, or causing noticeably increased breathing resistance. FFPs should only be reused by the same wearer and should be stored in the following way:

- According to manufacturer's recommendations,
- In a way that protects them from damage (including deforming the straps), dust, contamination, sunlight, extreme temperatures, excessive moisture, damaging chemicals, and
- In a way that prevents deformation of the facepiece and exhalation valve

While limited FFP reuse is practiced safely in many industrial workplaces, extra caution should be taken in certain workplaces where there are additional risks posed by handling a used or potentially contaminated respirator. For example, some pathogens such as those found in healthcare settings and biosafety labs, can remain infectious on the surface of the respirator for extended periods of time. Pathogens on the respirator surface can potentially be transferred by touch to the wearer's hands and thus risk causing infection through subsequent touching of the mucous membranes of the face (i.e., self-inoculation).

ATTACHMENT E

Southwest Gas Advice Letter No. 1130-G



SOUTHWEST GAS CORPORATION

March 25, 2020

Advice Letter No. 1130-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Implementation of Emergency Disaster Relief Program in Southwest Gas Corporation's Service Territory in Response to the COVID-19 State of Emergency Declaration Pursuant to Decision 19-07-015 and March 17, 2020 Executive Director Letter to Energy Utilities

Purpose

Southwest Gas Corporation (Southwest Gas) hereby submits this Tier 1 Advice Letter pursuant to Ordering Paragraph (OP) 1 of Decision (D.) 19-07-015 and the March 17, 2020 letter to the Energy Utilities from the Executive Director of the California Public Utilities Commission (Commission) concerning "Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency" (Executive Director Letter). There are no tariff sheets associated with this Advice Letter submission.

Background

In July 2019, the Commission issued D.19-07-015, which established a permanent set of emergency disaster customer protection measures that utilities are mandated to implement in the event the Governor of California or the President of the United States declares a state of emergency and the disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service. Pursuant to OP 2 in D.19-07-015, utilities must submit a Tier 1 Advice Letter within 15 days of a state of emergency declaration.

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19 to make additional resources available, formalize emergency actions already underway across multiple state agencies and departments, and help the State of California in the event of a broader spread of COVID-19. On March 13, 2020, Southwest Gas implemented a temporary moratorium on disconnections for non-payment for residential customers. Subsequently on March 17, 2020, the Commission's Executive Director Letter was issued acknowledging that although COVID-19 has not resulted in the same disruptions or degradations to utility service, the energy utilities are directed to extend the same applicable customer protections adopted in D.19-07-015 to customers in response to the declared state of emergency due to the spread of COVID-19. The utilities were further directed "...to report to the [Commission] on all customer protection



measures they implement in response to COVID-19 as soon as they are implemented, so that the [Commission] may publicly report on these measures. These customer protections should be retroactively applied to March 4, 2020.”

EDRP Customer Protections Implemented in Response to COVID-19

Although COVID-19 has neither 1) resulted in the loss or disruption of the delivery or receipt of natural gas service; nor 2) resulted in the degradation of the quality natural gas service, Southwest Gas recognizes that its customers may be impacted and experience financial hardship in relation to COVID-19. Therefore, Southwest Gas has implemented the following applicable EDRP customer protections until March 4, 2021, or until the end of the emergency declaration by the Governor for those affected by COVID-19:

- **Suspend disconnections for non-payment and waiver of deposits and late fee requirements**

Southwest Gas has suspended disconnections for non-payment for all customers (residential and non-residential). Additionally, Southwest Gas will waive deposits for residential customers who self-identify that they are impacted by COVID-19. Southwest Gas has automatically waived deposit requirements for all non-residential customers, including small businesses. Southwest Gas has also suspended the collection of late fees and the reporting of late payments to credit reporting agencies or to other credit/collection services for all customers. Southwest Gas will not apply interest on outstanding balances. Southwest Gas has also instructed its third-party collections representative to suspend contacting customers regarding outstanding balances.

Given the retroactive effective date of these customer protections to March 4, 2020, Southwest Gas assessed customers who were disconnected for non-payment between March 4 through 12, 2020, and restored service at the customer’s request.

Finally, all disconnect notifications due to non-payment, including outbound dialer calls have been suspended for all customers.

- **Flexible payment plan options**

For customers with an outstanding balance who inform Southwest Gas that they are impacted by COVID-19 resulting in their displacement, the following payment plan will be offered when establishing service at a new residence:

- The customer’s first payment will be no greater than 20% of the total outstanding balance. The remainder of the balance will be billed in not less than twelve equal monthly installments.



For impacted customers with active gas service who develop an outstanding balance, the following payment plan will be offered on the outstanding balance:

- The customer's first payment will be no greater than 20% of the total outstanding balance. The remainder of the balance will be billed in not less than eight equal monthly installments.

Southwest Gas will not penalize a customer for paying off an outstanding balance more quickly than the established payment plan. Additionally, Southwest Gas will not accrue interest on an impacted customer's outstanding balance.

- **Additional protections for income-qualified customers**

Southwest Gas has immediately suspended California Alternate Rates for Energy (CARE) program removals for residential customers, as well as recertification and income verification requests for CARE.

Given the retroactive effective date of these customer protections to March 4, 2020, Southwest Gas reenrolled the customers into the CARE program that were previously removed between March 4 and March 17, 2020. A notification was sent to these customers informing them of their reenrollment into the CARE program and that no additional action was required by them.

Southwest Gas will also suspend recertification requests for the Medical Baseline Allowance.

EDRP Customer Protections Not Implemented

Given the uniqueness of the COVID-19 state of emergency, Southwest Gas will not implement the following protections: (1) authorizing expedited move-in and move-out service requests, (2) suspension of estimated energy usage for billing, or (3) discontinued billing as these protections are not applicable. Pursuant to D.19-07-015, these protections were designed for customers who needed to relocate from damaged structures arising from wildfire, earthquakes or other disasters.

In addition, D.19-07-015 requires utilities to indicate how the Energy Savings Assistance (ESA) program can be deployed to assist impacted customers. This protection was intended to assist customers primarily impacted by wildfires, earthquakes or other disasters. As of the date of this Advice Letter, Southwest Gas has suspended its ESA program to protect Southwest Gas employees, customers and contractor personnel from the spread of COVID-19.

Communication and Outreach Plan for the EDRP Customer Protections

Southwest Gas will communicate the availability of the above EDRP customer protections to its customers through press releases, media statements, announcements on social



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media platforms and email blasts. A dedicated Interactive Voice Response (IVR) prompt has been established for California customers to access information regarding the EDRP customer protections. Southwest Gas customers will also be directed to access www.swgas.com/edrp or to contact Customer Assistance at 1-877-860-6020 for additional information.

Emergency Customer Protections Memorandum Account (EPCMA)

Southwest Gas will record costs associated with the implementation of the above customer protections in the EPCMA pursuant to D.19-07-015. The costs recorded to the EPCMA will be incurred beginning March 4, 2020, which is the date of the Governor's State of Emergency declaration. Pursuant to the EPCMA, Southwest Gas will recover the costs only after request by Southwest Gas and approval by the Commission.

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

Effective Date

Pursuant to OP 2 in D.19-11-005, this Advice Letter is classified as Tier 1 (Effective Pending Disposition) and subject to Energy Division disposition pursuant to General Order (GO) 96-B. Southwest Gas respectfully requests this Advice Letter be made effective on March 25, 2020, which is the date submitted.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 20 days after the date of this Advice Letter submission and shall be sent by letter via U.S. Mail, facsimile, or electronically mailed. The address for mailing or delivering a protest to the Commission is:

ATTN: Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Email: edtariffunit@cpuc.ca.gov
Facsimile: 415-703-2200



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

Mr. Justin Lee Brown
Senior Vice President/General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Email: justin.brown@swgas.com
Facsimile: 702-364-3452

Notice

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 in GO 96-B since this Advice Letter is submitted in compliance with OP 2 in D.19-11-005 and 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 mailing copies of this Advice Letter and related tariff sheets to the utilities and interested parties shown on the attached list. Southwest Gas will also serve this Advice Letter to all individuals on the established service list in Rulemaking 18-03-011.

Communications regarding this submission should be directed to:

Valerie J. Ontiveroz
Regulatory Manager/California
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Telephone: 702-876-7323
Email: valerie.ontiveroz@swgas.com

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Distribution List

Advice Letter No. 1130-G

In conformance with GO 96-B, General Rule 4.3

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

Elizabeth Echols, Director
Public Advocates Office
elizabeth.echols@cpuc.ca.gov

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PGETariffs@pge.com

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