



## SOUTHWEST GAS CORPORATION

Meridith J. Strand, Associate General Counsel

June 14, 2010

ALJ Myra J. Prestidge  
Administrative Law Judge Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Comments of Southwest Gas Corporation (U 905 G)  
on the Draft Resolution Number ALJ-244


Dear ALJ Prestidge:

Southwest Gas Corporation (Southwest or Company) respectfully submits these comments on the draft Resolution to modify the Pub. Util. Code § 851 pilot program established in Resolution ALJ-186 (adopted August 25, 2005), as modified by Resolution ALJ-202 (adopted August 23, 2007) (the pilot program), to reflect amendments made to Sections 851 and 853 by Assembly Bill (AB) 698 (effective January 1, 2010).

Although Southwest has yet to participate in the pilot program, the Company supports the adoption of Resolution ALJ-244 authorizing Commission review and approval of certain transactions involving the transfer or disposition of interests in utility property by advice letter. Southwest believes that the pilot program expedites and simplifies the procedures for review and approval of proposed transfers of interests in utility property subject to the requirements of Section 851. Further, Southwest supports extension of the pilot program until August 23, 2011, unless sooner extended or made permanent by the California Public Utilities Commission (CPUC).

Southwest appreciates the opportunity to submit these comments.

Sincerely,



Meridith J. Strand  
Associate General Counsel

cc: Janet A. Econome  
Assistant Chief ALJ

Wendy Al-Mukdad  
Energy Division

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Rebecca W. Giles  
Southern California Gas Company/  
San Diego Gas & Electric Company

All parties of record in proceedings:

R.98-07-038  
R.04-09-003  
R.05-04-005  
R.06-02-012  
R.06-02-016  
A.08-02-001  
R.08-02-007  
A.09-05-026  
R.09-06-019