

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

Order Instituting Rulemaking on the  
Commission's Own Motion to Consider  
Revising Energy Utility Tariff Rules Related  
to Deposits and Adjusting Bills as They  
Affect Small Business Customers

Rulemaking 10-05-005  
(Filed May 6, 2010)

**OPENING COMMENTS  
OF  
SOUTHWEST GAS CORPORATION  
(U 905 G)  
ON STAFF'S REPORT**

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

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6 **OPENING COMMENTS**  
7 **OF**  
8 **SOUTHWEST GAS CORPORATION**  
9 **(U 905 G)**  
10 **ON STAFF'S REPORT**

11 **I.**  
12 **INTRODUCTION**

13 On May 12, 2010, the California Public Utilities Commission ("Commission") issued  
14 an Order Instituting Rulemaking on the Commission's Own Motion to Consider Revising  
15 Energy Tariff Rules Related to Deposits and Adjusting Bills as They Affect Small Business  
16 Customers ("OIR") and Preliminary Scoping Memo, to determine if utility tariff rules should  
17 be revised and/or updated with regard to specific back-billing and deposit issues  
18 concerning small business customers.

19 On July 6, 2010, the Small Business and Community Outreach Staff ("Staff") held a  
20 workshop at the Commission's San Francisco office and thereafter drafted a Small  
21 Business Program Staff Report ("Report"). On July 28, 2010, Administrative Law Judge  
22 Bruce DeBerry issued a Ruling Providing Opportunity for Comments on Staff Report, with  
23 Opening Comments to be served on all parties by August 6, 2010, and Reply Comments  
24 to be served on all parties by August 17, 2010. Southwest Gas Corporation ("Southwest"  
25 or "Company") is a named respondent in this proceeding, and participated in the July 6,  
26 2010 workshop.

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**II.**  
**OPENING COMMENTS ON STAFF'S REPORT**

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Southwest believes Staff's Report contains a thorough review of the parties' written comments, as well as the discussions that took place during the workshop. Pursuant to the Report, Southwest is attaching a draft of its revised tariffs to these Opening Comments, as Exhibit "A". However, the workshop discussions and Staff's Report raise additional questions that Southwest believes need to be addressed in order for the utilities to successfully implement the tariff changes proposed in the Report.<sup>1</sup>

1. Southwest requests clarification as to when the small business definition should apply. For example, Southwest's small business customers will be defined as having an annual consumption of less than 10,000 therms. In situations involving a slow meter error, would the customer's usage be determined at the time the back-bill is generated, or after the correction is made? This is especially important in cases where correcting the error results in the customer's usage exceeding the 10,000 therm threshold, which would in turn allow for a back-bill in excess of three (3) months.
2. Similarly, how should the utilities handle changes in a customer's 12-month usage? For example, a customer's current 12-month usage could be just under 10,000 therms, thus allowing for only 3 months of back-billing and more lenient deposit treatment. In the next month, however, the customer's 12-month usage could exceed 10,000 therms. Or, the reverse could occur.
3. In those instances where a small business customer is defined according to the Government Code definition rather than its annual consumption, is the classification permanent, or is the classification only applicable through the expiration date on the customer's DGS certification (which is typically a 2 year period)?
4. Staff recommends that utilities not require small business customers to re-establish credit if a slow pay results from any back-billed amount.<sup>2</sup> Given that the utilities have agreed to limit back-billing for small business customers to a period of 3 months

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<sup>1</sup> See, Report. at pg. 18-21.

<sup>2</sup> *Id.* at pg. 18.

1 rather than 3 years, thereby reducing the back-bill amounts that  
2 the customers are being charged, Southwest suggests that the  
3 utilities should not have to waive a re-establishment of credit  
4 deposit indefinitely. Instead, Southwest proposes that the utilities  
5 be required to waive re-establishment of credit deposits resulting  
6 from the slow pay of a back-billed amount for only a fixed period of  
7 time. Southwest believes that this fixed time frame should not  
8 exceed 6 months.

9  
10 5. Staff also recommends that the utilities revise their tariffs, “to  
11 correct the meter error discrepancy highlighted in the OIR. . .”<sup>3</sup>  
12 Although this issue was mentioned at the workshop it was not  
13 discussed in great depth, and Southwest believes clarification is  
14 necessary to determine what part of the tariff, if any, requires  
15 revision. Currently, Southwest’s Rule 17 provides that the  
16 Company will, “. . . issue a refund or credit to the customer for the  
17 amount of the overcharge, computed back to the date that the  
18 Company determines the meter error commenced, except that the  
19 period of adjustment shall not exceed three years.”<sup>4</sup> This is  
20 consistent with the tariff provision requiring the Company to refund  
21 a customer for a period not to exceed three years when there is an  
22 overcharge resulting from a billing error.<sup>5</sup> However, the tariff also  
23 provides that when a meter is found to be registering fast, **and the  
24 period of error is not known**, the Company can base the  
25 customer’s refund on estimated energy usage for the period during  
26 which the meter was in use, not to exceed 6 months.<sup>6</sup> The fast  
27 meter provision has no companion provision in the billing error  
28 section of the tariff. Accordingly, Southwest does not believe that  
there is a meter error discrepancy in its tariff.

6. Southwest agrees with Staff’s recommendation that the deposit  
rules for small business customers be changed to two times the  
average monthly bill.<sup>7</sup> Southwest also agrees that cash deposits to  
re-establish credit should be waived for small business customers  
who enroll in the Company’s Automatic Payment Plan (“APP”).<sup>8</sup>  
However, Southwest suggests that the APP option be limited to  
once within a 12 month consecutive period. Not only does this

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<sup>3</sup> *Id*

<sup>4</sup> See, excerpt from Tariff Rule 17, attached hereto as Exhibit “B”.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* Emphasis added.

<sup>7</sup> See, Report. at pg. 20.

<sup>8</sup> *Id.*

1 provide small business customers with the incentive to make timely  
2 payments, it is consistent with Southwest's current business  
practice for its residential customers.

- 3 7. Southwest further believes that the utilities should be allowed to  
4 recover any costs associated with the proposed changes to their  
back-billing and deposit practices.

5  
6 **III.**  
**CONCLUSION**

7 Southwest appreciates the opportunity to provide comments and participate in the  
8 workshop in this rulemaking. Southwest will continue to actively participate in this docket,  
9 and looks forward to the continued comments and dialogue between the parties and Staff  
10 as to the recommended tariff changes.

11 Dated this 6<sup>th</sup> day of August, 2010, at Las Vegas, Nevada.

12 SOUTHWEST GAS CORPORATION

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California Gas Tariff

Canceling \_\_\_\_\_ Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. \_\_\_\_\_ -G  
Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. 4299-G

RULE NO. 1

DEFINITIONS  
(Continued)

GENERAL (Continued)

Service:	All pipe, valves, and fittings from and including the connection at the main up to and including the stop-cock on the riser.
Service Extension:	Consists of the service as above defined when provided for a new customer at a premise not heretofore served in accordance with the service extension rule.
Small Business Customer:	Any non-residential customer with an annual consumption of less than 10,000 therms or any non-residential customer who meets the definition of "micro-business" in California Government Code Section 14837.
Standing Nomination:	A Daily Nomination which is effective for multiple Gas Days. Standing Nominations cannot exceed the term of the customer's Transportation Service Agreement. A Standing Nomination can be replaced by a new Daily Nomination or Intra-day Nomination; however, upon the expiration of such replacement Nomination, the Standing Nomination becomes effective again.
Stub Service:	A lateral pipe, including valves and fittings, from and including the connection at the main to a dead end near the curb or property line of the street in which the main is located.
Subcustomer:	A tenant in an apartment house or other business building to whom gas is resold by the customer from whom the tenant rents.
Summer Season:	The six-month period beginning May 1 and ending October 31.
Tariff Schedules:	The entire body of effective rates, rentals, charges, and rules collectively, of the Company, as set forth herein, and including title page, preliminary statement, rate schedules, rules and sample forms.
Tariff Sheet:	An individual sheet of the tariff schedule.
Temporary Service:	Service for enterprises or activities which are temporary in character or where it is known in advance that service will be of limited duration. Service which, in the opinion of the Company, is for operations of a speculative character or the permanency of which has not been established also is considered temporary service.

Advice Letter No. _____	Issued by _____	Date Filed _____
Decision No. _____	John P. Hester	Effective _____
	Senior Vice President	Resolution No. _____

SOUTHWEST GAS CORPORATION  
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California Gas Tariff

Canceling \_\_\_\_\_ Revised \_\_\_\_\_  
Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. \_\_\_\_\_ -G  
Cal. P.U.C. Sheet No. 3057-G

RULE NO. 7

DEPOSITS

A. AMOUNT TO ESTABLISH CREDIT

The amount of deposit required to establish credit is twice the estimated maximum monthly bill, or for Small Business Customers, twice the estimated monthly average bill.

B. AMOUNT TO REESTABLISH CREDIT

1. Former Customers

Where an applicant is a former customer whose service was discontinued during the last 12 months of his former service for nonpayment of bills, such applicant may be required to pay such former bills and reestablish his credit by depositing an amount equal to twice the estimated maximum monthly bill for the service desired.

2. Present Customers

a. A customer whose service has been discontinued for nonpayment of bills may be required to pay such bills and deposit an amount equal to twice the estimated maximum monthly bill.

b. If a customer receives a bill that is two months past due or becomes delinquent in the payment of a total of six monthly bills within a 12 consecutive month period, such customer may be required to reestablish his credit by depositing an amount not to exceed twice the estimated maximum monthly bill. Small Business Customers may be required to reestablish credit by depositing an amount not to exceed twice the estimated average monthly bill. A Small Business Customer may enroll in the Company's Automatic Payment Program once within a twelve month consecutive period, in lieu of a cash deposit for reestablishing service.

C. APPLICABILITY TO UNPAID ACCOUNTS

Deposits prescribed herein are applicable to unpaid bills for gas service when such service has been discontinued. Deposits will not be applied as payment for past due bills to avoid discontinuance of service.

D. RETURN OF DEPOSITS

The Company will refund the customer's deposit:

- 1. When service is ordered discontinued by the customer (less the amount of any unpaid bills), or
- 2. After the customer has, for 12 consecutive months, paid bills for service within 15 days after presentation, except as provided in accordance with Rule No. 6(B)(4).

Advice Letter No. \_\_\_\_\_  
Decision No. \_\_\_\_\_

Issued by \_\_\_\_\_  
John P. Hester  
Senior Vice President

Date Filed \_\_\_\_\_  
Effective \_\_\_\_\_  
Resolution No. \_\_\_\_\_

SOUTHWEST GAS CORPORATION

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California Gas Tariff

Canceling \_\_\_\_\_ Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. \_\_\_\_\_ -G  
 \_\_\_\_\_ Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. 2898-G

## RULE NO. 17

METER TESTS AND ADJUSTMENT OF BILLS*(Continued)*B. ADJUSTMENT OF BILLS *(Continued)*2. Adjustment of Bills for Meter Error *(Continued)*

- b. Slow Meter. If a meter for domestic service is found to be registering more than 25 percent slow, or meter for other class of service is found to be registering more than two percent slow, the Company may bill the customer for the amount of the undercharge based on corrected meter readings or the Company's estimate of the energy usage either for the known period of meter error or, if the period of meter error is not known for the period the meter was in use, not exceeding three months in the case of residential and small business service, and three years for other nonresidential service.
- c. Nonregistering Meter. If a meter is found to be nonregistering, the Company may bill the customer for the Company's estimate of the gas service used but not registered, not exceeding three months in the case of residential and small business service, and three years for other nonresidential service.
- d. Other Than Displacement Gas Meter. For other than displacement gas meters, if the customer or the Company shall at any time have reason to doubt the accuracy of any gauge, measuring device, other appliance, data, or method used in measuring or computing the amount of gas delivered through other than displacement meters, notification shall be given to the other party and, within a reasonable time, the accuracy of such gauge, measuring device, appliance, data, or method shall be determined (upon request, jointly in the presence of both parties) and if any of them shall be found inaccurate, the proper correction in billing shall be made as follows:

In the case of computation errors or inaccurate data, where the date can be fixed or agreed upon, such correction in billing shall begin starting with the date of initial error.

In the case of a gauge, measuring device, or appliance found to be out of tolerance sufficient to cause a volume error greater than  $\pm$  two percent, such correction in billing shall begin on a mutually acceptable date. In the absence of such mutual acceptance, the correction shall begin on a date equivalent to 50 percent of the elapsed period since the last valid calibration or test.

Advice Letter No. \_\_\_\_\_  
 Decision No. \_\_\_\_\_

Issued by  
 John P. Hester  
 Senior Vice President

Date Filed \_\_\_\_\_  
 Effective \_\_\_\_\_  
 Resolution No. \_\_\_\_\_



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California Gas Tariff

Canceling \_\_\_\_\_ Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. 3088-G  
Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. 2897-G

RULE NO. 17

METER TESTS AND ADJUSTMENT OF BILLS  
(Continued)

B. ADJUSTMENT OF BILLS

1. General

Estimated Usage: When regular, accurate meter readings are not available or gas usage has not been accurately measured, the Company may estimate the customer's energy usage for billing purposes on the basis of information including but not limited to the physical condition of the metering equipment, available meter readings, records of historical use, and the general characteristics of the customer's load and operation.

2. Adjustment of Bills for Meter Error

A meter error is an error in gas registration resulting from a malfunctioning or defective meter or pressure correction device. A meter error does not include a billing error, unauthorized use, nor any error in registration caused by meter tampering by an unauthorized person. It also does not include conditions such as incorrect meter readings, meter dial overs, or switched meters.

Where, as the result of a meter test, except for "Other Than Displacement Gas Meters," as described in Section B.2.d., a meter is found to be nonregistering or incorrectly registering, the Company may render an adjusted bill to the customer for the amount of the undercharge, and shall issue a refund or credit to the customer for the amount of the overcharge, computed back to the date that the Company determines the meter error commenced, except that the period of adjustment shall not exceed three years. Such adjusted bill shall be computed in accordance with the following:

- a. Fast Meter. If a meter is found to be registering more than two percent fast, the Company will refund to the customer the amount of the overcharge based on the corrected meter readings or the Company's estimate of the energy usage either for the known period of meter error or, if the period of error is not known, for the period during which the meter was in use, not to exceed six months.

Advice Letter No. \_\_\_\_\_ Issued by \_\_\_\_\_ Date Filed \_\_\_\_\_  
Decision No. \_\_\_\_\_ Edward S. Zub \_\_\_\_\_ Effective \_\_\_\_\_  
Executive Vice President Resolution No. \_\_\_\_\_

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California Gas Tariff

Canceling \_\_\_\_\_ Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. 3090-G  
Revised \_\_\_\_\_ Cal. P.U.C. Sheet No. 2899-G

RULE NO. 17

METER TESTS AND ADJUSTMENT OF BILLS  
(Continued)

B. ADJUSTMENT OF BILLS (Continued)

2. Adjustment of Bills for Meter Error (Continued)

In all cases where corrections are to be made, the amount of gas delivered during the established period of inaccuracy shall be recalculated and corrected. Thereafter, measurements shall be made in accordance with correct data and any inaccurate devices shall be recalibrated within published manufacturer's tolerances.

3. Adjustment of Bills for Billing Error

A billing error is an error by the Company which results in incorrect billing charges to the customer. Billing errors may include incorrect meter reads or clerical errors by a Company representative such as applying the wrong rate, wrong billing factor, or an incorrect calculation. A billing error does not include a meter error or unauthorized use, nor any error in billing resulting from meter dial over; switched or mismarked meters by other than the Company; inaccessible meter; failure of the customer to notify the Company of a change in the customer's operation; or failure of the customer to take advantage of a rate or condition of service for which the customer is eligible.

Where the Company overcharges or undercharges a customer as the result of a billing error, the Company may render an adjusted bill for the amount of the undercharge, and shall issue a refund or credit to the customer for the amount of the overcharge for the period of the billing error, but not exceeding three years in the case of an overcharge, and, in the case of an undercharge, not exceeding three months for residential service and three years for nonresidential service.

4. Adjustment of Bills for Unauthorized Use

Unauthorized use is the use of energy in noncompliance with the Company's tariffs or applicable law. It includes, but is not limited to, meter tampering, unauthorized connection or reconnection, theft, fraud, or intentional or unintentional use of energy whereby the Company is denied full compensation for service provided.

Where the Company determines that there has been unauthorized use of Company gas service, the Company may bill the customer for the Company's estimate of up to three years of such unauthorized use. However, nothing in this rule shall be interpreted as limiting the Company's rights in any provisions of any applicable law.

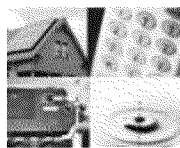
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Decision No. \_\_\_\_\_ Edward S. Zub \_\_\_\_\_ Effective \_\_\_\_\_  
Executive Vice President Resolution No. \_\_\_\_\_

**CERTIFICATE OF SERVICE**

1  
2 I hereby certify that I have this day served the foregoing OPENING COMMENTS  
3 OF SOUTHWEST GAS CORPORATION (U 905 G) ON STAFF'S REPORT upon the  
4 individuals on the established service list in proceeding R.10-05-005 by electronic mail  
5 (email) service. Those individuals without an email address were served by regular, first-  
6 class mail.

7 Dated this 6<sup>th</sup> day of August, 2010 at Las Vegas, Nevada.  
8  
9

10 /s/ Valerie J. Ontiveroz  
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Utilities Commission

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### Information Only

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[http://docs.cpuc.ca.gov/published/service\\_lists/R1005005\\_79112.htm](http://docs.cpuc.ca.gov/published/service_lists/R1005005_79112.htm)

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SB\_GT&S\_0017144

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