

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Ratemaking Mechanisms.

Rulemaking 11-02-019
(File February 24, 2011)

NOTICE OF EX PARTE COMMUNICATIONS

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September 3, 2013

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6 **NOTICE OF EX PARTE COMMUNICATIONS**

7 Pursuant to Rule 8.4 of the California Public Utilities Commission's (Commission)
8 Rules of Practice and Procedure, Southwest Gas Corporation (Southwest Gas or Company)
9 hereby gives notice of the ex parte communications described below. The first four
10 communications occurred Wednesday, August 28, 2013 at the Commission's offices located
11 at 505 Van Ness Avenue, San Francisco, California. The final communication occurred
12 telephonically on Friday, August 30, 2013. All communications were oral.¹

- 13 • Between approximately 11:00 a.m and 11:30 a.m., Justin Lee Brown, Vice
14 President of Pricing for Southwest Gas and Catherine M. Mazzeo, Associate
15 General Counsel for Southwest Gas, met with Allison Brown, Legal Advisor to
16 Commissioner Sandoval.
- 17 • Between approximately 11:30 a.m. and 12:00 p.m., Mr. Brown and Ms.
18 Mazzeo met with Carol Brown, Chief of Staff to President Peevey.
- 19 • Between approximately 2:30 p.m. and 3:00 p.m., Mr. Brown and Ms. Mazzeo
20 met with Charlyn Hook, Legal Advisor to Commissioner Ferron.
- 21 • Between approximately 3:00 p.m. and 3:30 p.m., Mr. Brown and Ms. Mazzeo
22 met with Commissioner Florio and Sepideh Khosrowjah, Chief of Staff to
23 Commissioner Florio.
- 24 • On August 30, 2013, between approximately 11:30 a.m. and 12:00 p.m., Mr.
25 Brown and Ms. Mazzeo met telephonically with Jennifer Kalafut, Water and
26 Energy Advisor to Commission Peterman and Niki Bawa, Legal Advisor to
27 Commissioner Peterman.

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¹ Rule 8.4(a).

1 Each of the above-referenced meetings was initiated by Southwest Gas.² During
2 each meeting, Mr. Brown and Ms. Mazzeo summarized Southwest Gas' concerns (as
3 reflected in the Company's Opening Comments) regarding the Proposed Decision
4 Mandating Pipeline Safety Implementation Plan, Disallowing Costs, and Authorizing
5 Memorandum Account (Proposed Decision), issued in this proceeding on August 5, 2013.
6 Mr. Brown and Ms. Mazzeo explained Southwest Gas' position that the Proposed Decision
7 denies the Company due process, and fails to consider evidence of facts and circumstances
8 applicable to the Company's transmission pipeline system at the time of installation, resulting
9 in a finding of imprudence and a proposed disallowance that are unsupported by the
10 evidence and punitive to the Company.³ No handouts were provided at the meetings.

11 Respectfully submitted this 3rd day of September 2013.

12 SOUTHWEST GAS CORPORATION

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² Rule 8.4(b).

³ Rule 8.4(c).