

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop a Risk-Based Decision-Making Framework to Evaluate Safety and Reliability Improvements and Revise the General Rate Case Plan for Energy Utilities.

Rulemaking 13-11-006
(Filed November 14, 2013)

**REPLY COMMENTS OF
SOUTHWEST GAS CORPORATION (U 905 G)**

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1 ORA suggests a flexible timeline for processing small utility rate cases, and recommends
2 that the Commission not specify any timeline for small utility rate cases beyond a four-year
3 minimum general rate case (GRC) cycle.³ While Southwest Gas generally agrees that the Rate
4 Case Plan should not be overly prescriptive, it encourages the Commission to retain the currently
5 existing timeline for processing small utility rate cases (i.e. completion of the rate case within 12
6 months, subject to the availability of Commission resources) so that there is a general and
7 consistent framework for the Commission and all interested parties to adhere to.

8 Further, Southwest Gas agrees with Southern California Edison Company (SCE) that "a
9 more significant issue in recent GRCs has been the Commission not issuing a final decision
10 within the timeframe found in the Rate Case Plan, or established in the scoping memo."⁴
11 Accordingly, and in addition to maintaining the Rate Case Plan as it applies to small utilities,
12 Southwest Gas suggests that the Commission consider a concept similar to that employed by the
13 Federal Energy Regulatory Commission, whereby new rates are deemed effective and put in
14 place the beginning of the test period, yet remain subject to refund upon the issuance of a final
15 decision. Alternatively, the Commission could establish a memorandum account for the utility
16 early on in the rate case process, which could then be used to track and record the difference
17 between current and authorized rates in the event a final Commission decision is not issued prior
18 to the proposed rate effective date.

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24 ³ See, ORA Comments at p. 9.

25 ⁴ See, SCE Comments, at p. 10. See *also*, Comments of Southern California Gas Company and San Diego Gas & Electric Company, at p.6; Comments of Pacific Gas & Electric Company, at p. 7.

1 Southwest Gas once again appreciates the opportunity to provide these comments and
2 looks forward to working with the Commission and other interested parties to address the issues
3 raised in this Rulemaking.

4 Respectfully submitted this 30th day of January 2014.

5 SOUTHWEST GAS CORPORATION

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