BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Natural Gas and Electric Safety Citation Programs

Rulemaking 14-05-013 (Filed May 15, 2014)

COMMENTS OF SOUTHWEST GAS CORPORATION (U 905 G)

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Attorney for Southwest Gas Corporation

June 4, 2014

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I. Introduction

On May 21, 2014, the California Public Utilities Commission (Commission) issued an Order Instituting Rulemaking (OIR) in the above-referenced proceeding to, "...1) implement a new electric safety citation program in compliance with [Senate Bill] 291; 2) improve and refine the Commission's gas and electric safety citation programs; and 3) consider the timing and process for possible future modifications of the Commission's gas and electric safety citation programs." Because Senate Bill (SB) 291 requires that an electric safety citation program be implemented no later than January 1, 2015, the OIR seeks to conduct this Rulemaking in multiple phases, with the first phase devoted to the development and implementation of an electric safety citation program, and later phases devoted to the improvement and refinement of the Commission's gas and electric safety citation programs.²

Southwest Gas Corporation (Southwest Gas or Company) is a natural gas local distribution company, engaged in the retail transmission, distribution, transportation, and sale of natural gas for domestic, commercial, agricultural, and industrial uses. The Company serves approximately 190,000 customers in San Bernardino, Placer, El Dorado and Nevada

¹ OIR, at p. 7.

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counties. Southwest Gas is a natural gas corporation subject to the Commission's jurisdiction and as such, is a respondent to this OIR.³

II. Scope, Schedule, Categorization and Need for Hearing

Southwest Gas agrees with the preliminary scope for this Rulemaking, as set forth in Sections 3.1 and 3.2 of the OIR, particularly as it relates to the improvement and refinement of the Commission's natural gas safety citation program. Southwest Gas also agrees that this OIR should be categorized as quasi-legislative. Southwest Gas does not have electric operations and does not anticipate actively participating in the first phase of this Rulemaking. As such, the Company has no comment on the preliminary schedule set forth in Section 3.3 of the OIR, nor the preliminary determination as to the need for hearings.

III. Conclusion

Southwest Gas appreciates the opportunity to participate in this Rulemaking and looks forward to working with the Commission and other interested parties.

DATED this 4th day of June, 2014.

Respectfully submitted.

SOUTHWEST GAS CORPORATION

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³ Id. at p. 22, Ordering Paragraph 6.