

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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June 4, 2014

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7 **I. Introduction**

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

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

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25 ¹ OIR, at p. 7.

² Id. at p. 9-10.

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

3 **II. Scope, Schedule, Categorization and Need for Hearing**

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

11 **III. Conclusion**

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

14 DATED this 4th day of June, 2014.

15 Respectfully submitted,

16 SOUTHWEST GAS CORPORATION

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3³ Id. at p. 22, Ordering Paragraph 6.