

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.

Rulemaking13-11-006
(Filed November 14, 2013)

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

Catherine M. Mazzeo
5241 Spring Mountain Road
Las Vegas, NV 89150-0002
Telephone: 702.876.7250
Facsimile: 702.252.7283
Email: catherine.mazzeo@swgas.com

Attorney for Southwest Gas Corporation

August 22, 2014

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

2
3 Order Instituting Rulemaking to Develop a
4 Risk-Based Decision-Making Framework to
5 Evaluate Safety and Reliability Improvements
6 and Revise the General Rate Case Plan for
7 Energy Utilities.

Rulemaking13-11-006
(Filed November 14, 2013)

8 **SECOND ROUND REPLY COMMENTS OF**
9 **SOUTHWEST GAS CORPORATION (U 905 G)**

10 In accordance with the May 15, 2014 Scoping Memo and Ruling of the Assigned
11 Commissioner and Administrative Law Judge, Southwest Gas Corporation (Southwest Gas or
12 Company) hereby provides its Second Round Reply Comments in the California Public Utilities
13 Commission's (Commission) Order Instituting Rulemaking to Develop a Risk-Based Decision-
14 Making Framework to Evaluate Safety and Reliability Improvements and Revise the General
15 Rate Case Plan for Energy Utilities (OIR).

16 Southwest Gas is a small, multi-jurisdictional utility (SMJU), serving customers in
17 California, Arizona and Nevada. As it appears that a majority of the second round opening
18 comments focus on potential revisions to the Rate Case Plan (RCP) for large utilities, Southwest
19 Gas' Second Round Reply Comments respond only to the opening comments of the Office of
20 Ratepayer Advocates (ORA), and specifically to ORA's discussion of the Notice of Intent (NOI).¹
21 Southwest Gas supports ORA's suggestion that "[S]mall and mid-sized energy utilities do not
22 need to tender an NOI."² Southwest Gas believes that elimination of the NOI will increase the
23 efficiency of the SMJU rate case process, and the Company supports modifications to the RCP in
24 this regard.

25 . . .

26 . . .

27
28 ¹ ORA second round opening comments, p.2.

² Id.

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

4 DATED this 22nd day of August 2014.

5 Respectfully submitted,

6 SOUTHWEST GAS CORPORATION

7
8 

9 Catherine M. Mazzeo
10 5241 Spring Mountain Road
11 Las Vegas, NV 89150-0002
12 Telephone: 702.876.7250
13 Facsimile: 702.252.7283
14 Email: catherine.mazzeo@swgas.com

15 *Attorney for Southwest Gas Corporation*