

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

Order Instituting Rulemaking on the Commission's  
Proposed Policies and Programs Governing Post-2003  
Low-Income Assistance Programs.

And Related Matters

Rulemaking 04-01-006  
(Filed January 8, 2004)

Application 04-06-038  
(Filed June 30, 2004)

Application 04-07-002  
(Filed July 1, 2004)

Application 04-07-014  
(Filed July 1, 2004)

Application 04-07-015  
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Application 04-07-020  
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Application 04-07-027  
(Filed July 2, 2004)

Application 04-07-050  
(Filed July 29, 2004)

**Response of  
Southwest Gas Corporation (U 905 G)  
to the June 10, 2005  
Energy Division Supplemental Report on  
Small and Multi-Jurisdictional Utilities  
For PY 2005 Low Income Programs**

Bridget A. Branigan  
Senior Counsel  
Southwest Gas Corporation  
P.O. Box 98510  
5241 Spring Mountain Road  
Las Vegas, Nevada 89193-8510  
Phone: (702) 876-7396  
Fax: (702) 252-7283  
E-mail: [bridget.branigan@swgas.com](mailto:bridget.branigan@swgas.com)

Dated: June 17, 2005

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to the June 10, 2005  
Energy Division Supplemental Report on  
Small and Multi-Jurisdictional Utilities  
For PY 2005 Low Income Programs**

Southwest Gas Corporation (Southwest) hereby submits its Response to the June 10, 2005 "Energy Division Supplemental Report on Small Multi-Jurisdictional Utilities (SMJUs) for PY 2005 Low Income Programs".

**I.  
INTRODUCTION**

On June 10, 2005, the Energy Division filed its Supplemental Report on Small Multi-Jurisdictional Utilities (SMJUs) for PY 2005 Low Income Programs and requested confirmation of the information reflected therein. Southwest has reviewed the Report and offers the following comments and proposed revisions.

**II.  
DISCUSSION**

**A. Table 4 – Utility Estimated 2004 CARE Eligible Rates**

The Energy Division estimated Southwest's Total Primary/Year-Round Residential Customers to be 124,179. As reflected on Page 3 of Southwest's Low-Income Assistance

Program 2004 Annual Report, the total residential customers are 135,824 as of December 31, 2004. This number consists of 116,060 Primary /Year-Round Residential Customers and 19,764 Secondary/Seasonal Residential Customers. Therefore, the Total Primary/Year-Round Residential Customers that have been estimated in Table 4 as 124,179, should be amended to 116,060.

**B. Table 29 – Utility Average CARE Outreach Costs per Permanent Resident**

The Energy Division calculates Southwest's Average 2004 Outreach Costs per Permanent resident at \$0.48 utilizing its estimated Primary/Year-Round Residential Customers of 124,179. However, as stated in Section A. Southwest's actual Total Primary/Year-Round Customers as of December 31, 2004 was 116,060, resulting in an average 2004 Outreach Cost of \$0.51 per permanent resident.

**C. Table 41 – CARE General Expenditures**

According to information provided in Table 41, Southwest's 2004 Actual CARE General Expenditures are \$22,092. This amount includes estimated costs subsumed in general rates totaling \$5,722. Costs already subsumed in general rates should not be recovered by the PPP surcharge. Therefore, the total PPP funded costs for CARE General Expenditures in 2004 should be amended to \$16,370. Alternatively, Southwest recommends a footnote be added beneath Table 41 which states that the Actual CARE General Expenditures totaling \$22,092 include \$5,722 of costs already subsumed in general rates.

**D. Table 48 – Comparison of LIEE Programs Across Years**

The Total Program – Total Unspent Funds is inaccurately shown on Table 48 because it does not reflect the portion of the SB 5 funding approved and spent in 2001 and 2002. In addition, the SB 5 funds were rescinded in accordance with California Senate Bill 1095. Therefore, the unspent SB5 funds are not available for carryover. Listed below are the

authorized funding levels, funds spent and unspent funds by Decision. Thus, the accurate amount of unspent funds to be carried over for use in the 2005 program year is \$204,102.

Funding Type Year	Decision	Funds Authorized	Funds Spent	Unspent Funds
<b>SB 5 2001-2003</b>	<b>D.01-08-065</b>	<b>\$2,374,419</b>	<b>\$2,300,860</b>	<b>\$73,559</b>
Ratepayer 2003	D.03-03-007	\$500,000	\$436,882	\$63,118
Ratepayer 2004	D.03-12-016	\$936,560	\$795,576	\$140,984
<b>Total Ratepayer Carryover</b>		<b>\$1,436,560</b>	<b>\$1,220,388</b>	<b>\$204,102</b>

**E. Avista Corporation**

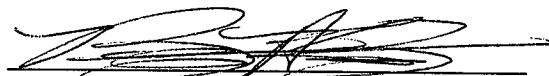
Southwest has confirmed with Avista Corporation (South Lake Tahoe) that all figures contained in the Energy Division's Supplemental Report are correct. For clarification, the Total Unspent Funds of \$54,956 shown as on Table 48 are all unspent SB 5 funds that were rescinded in accordance with California Senate Bill 1095. Southwest will continue to review the existing South Lake Tahoe programs to ensure customer benefits are maximized.

**III.  
CONCLUSION**

Southwest appreciates the opportunity to respond to the Energy Division's Supplemental Report on Small and Multi-Jurisdictional utilities for PY 2005 Low Income Programs and looks forward to continued participation in this proceeding.

Dated this 17<sup>th</sup> day of June, 2005.

SOUTHWEST GAS CORPORATION



Bridget A. Branigan  
 Senior Counsel  
 5241 Spring Mountain Road  
 Las Vegas, Nevada 89150  
 (702) 876-7396  
 (702) 252-7283 *facsimile*  
[bridget.branigan@swgas.com](mailto:bridget.branigan@swgas.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **Response of Southwest Gas Corporation (U 905 G) to the June 10, 2005 Energy Division Supplemental Report on Small and Multi-Jurisdictional Utilities For PY 2005 Low Income Programs** on each party named on the official service list in proceeding R.04-01-006 by electronic mail or regular first-class mail.

Dated at Las Vegas, Nevada, this 17<sup>th</sup> day of June 2005.

  
An employee of Southwest Gas Corporation