

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures
and Rules for the Low-Income Energy Efficiency Programs
of California's Energy Utilities.

Rulemaking 07-01-042
(Filed January 25, 2007)

**SOUTHWEST GAS CORPORATION
(U 905 G)
COMMENTS ON THE SCOPING RULING FOR
THE COMMISSION'S RULEMAKING ON
THE LOW-INCOME ENERGY EFFICIENCY PROGRAMS OF
CALIFORNIA'S ENERGY UTILITIES**

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Dated: April 27, 2007

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Pursuant to the Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Low Income Energy Efficiency Programs of California's Energy Utilities issued on January 25, 2007, and the Scoping Ruling issued on March 28, 2007, Southwest Gas Corporation (Southwest) respectfully submits its comments as requested by the Administrative Law Judge (ALJ).

I.
INTRODUCTION

Southwest serves approximately 1.8 million customers in Arizona, Nevada and portions of California. Southwest has two distinct service territories in California (northern and southern), serving approximately 177,000 customers (approximately 10 percent of Southwest's total three-state customer base) statewide. The customer base is 95 percent residential. For thirty years, Southwest has made a commitment to energy conservation in California. As part of that commitment, Southwest will continue to provide energy-efficiency assistance to low-income residential customers through its LIEE program. Southwest provides weatherization as a major component of its LIEE program and in the last ten years has assisted over 6,000 customers. Weatherization meets the intended broad objectives

and goals of the Commission in reducing the energy burdens of its low-income customers while improving the overall environmental quality and mitigating the growing energy needs of California.

Southwest understands and strives to serve its unique customer base in the best manner possible while balancing the goals and objectives of the Commission. Southwest intends to address the questions most pertinent to Southwest's LIEE program. Southwest's answers come from the perspective of a small multi-jurisdictional utility.

II. **DISCUSSION**

A. PROPOSED GOAL STATEMENT

Southwest encourages the broad program objectives listed in the Scoping Ruling. Southwest believes total system reliability is an important aspect and is involved in other proceedings to further this objective. The LIEE program goals should include elements which focus on safely and cost-effectively reducing energy bills, along with conserving valuable resources, and preserving the environment.

B. ADDITIONAL CRITERIA FOR CONSIDERATION

Southwest believes the Commission should treat some program elements separately from the goal statement. In some cases, a home in need of assistance may have an unsafe or hazardous condition which must be addressed before most energy efficiency measures can be installed. There may be homes that need to be brought up to the current building code(s) before any weatherization measures can be installed. Examples may include improper venting, faulty natural gas appliances, and structural damage.

In addition to the health and safety of the low-income customer, along with the cost-effectiveness of the LIEE program, the rate impact on the non-low-income customers

should be considered. Southwest, unlike the major California energy utilities, is in a unique situation where approximately 95 percent of its customer base is residential.

C. LOW-INCOME HOUSEHOLDS IN NEED OF ENERGY EFFICIENCY MEASURES AND ASSOCIATED COSTS

Southwest estimates approximately 40,000 low-income households in its California service areas are in need of varied levels of energy efficiency assistance. Over the seven year time frame from 2009 to 2015, this would equate to roughly 5,700 homes per year.

In order to meet this ambitious goal, a minimum of \$40 million or just over \$5.7 million per year would be needed to assist the estimated number of low-income households. These estimated costs are based on Southwest's average cost totaling just under \$1,000 per home for the prior three years. Southwest estimates the Public Purpose Program (PPP) surcharge increases by approximately one cent per therm for every \$1 million of funding. This implies the PPP surcharge would need to be increased by about 5.7 cents per therm. Southwest is concerned that an increase this size could further negatively impact its residential customers, especially those middle or low income customers who just miss the qualifying income guidelines for the CARE Program, and would in turn have to also bear the burden of subsidizing this program enhancement.

Currently, Southwest's General Residential (non-low-income) customers in Southern California pay a PPP surcharge equal to \$0.13 per therm and is approximately double that of the other California utilities. Southwest is concerned about any additional increases in the PPP.

III. **CONCLUSION**

Southwest appreciates the opportunity to participate in refining the policies, rules and programs for the LIEE programs of California. Although the LIEE program presents

Southwest a unique set of challenges because of its unique customer base and service territory, Southwest remains dedicated to the overall energy efficiency goals of California with the understanding that safety, cost-effectiveness, and education are an integral part of any further developments in the LIEE program.

Dated at Las Vegas, Nevada this 27th day of April, 2007.

/s/ Francisco V. Aguilar

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **SOUTHWEST GAS CORPORATION (U 905 G) COMMENTS ON THE SCOPING RULING FOR THE COMMISSION'S RULEMAKING ON THE LOW-INCOME ENERGY EFFICIENCY PROGRAMS OF CALIFORNIA'S ENERGY UTILITIES** on each party named on the official service list in proceeding R.07-01-042 by electronic mail or regular first-class mail.

Dated at Las Vegas, Nevada, this 27th day of April 2007.

/s/ Valerie J. Ontiveroz

An employee of Southwest Gas Corporation

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R.07-01-042
Last Update: APRIL 6, 2007

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