



# SOUTHWEST GAS CORPORATION

April 16, 2021

## **Advice Letter No.1170-G-A**

(U 905 G)

Public Utilities Commission of the State of California

**Subject: Transition Plan for the Expiration of Emergency Customer Protections Pursuant to Resolution M-4849**

### **Purpose**

Southwest Gas Corporation (Southwest Gas) hereby submits this partial supplemental Advice Letter to comply with Ordering Paragraph (OP) 5 of Resolution M-4849, *Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections* (Resolution M-4849). There are no tariff sheets associated with this submission.

### **Background**

In July 2019, the Commission issued Decision (D.) 19-07-015, which established a permanent set of emergency disaster customer protection measures that utilities are mandated to implement in the event the Governor of California or the President of the United States declares a state of emergency and the disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service.

On March 4, 2020, Governor Newsom declared a State of Emergency in California related to COVID-19 to make additional resources available, formalize emergency actions already underway across multiple state agencies and departments, and help the State of California in the event of a broader spread of COVID-19. As a result, and pursuant to OP 2 in D.19-07-015, Southwest Gas submitted Advice Letter 1130 on March 25, 2020 detailing the Emergency Disaster Relief Program (EDRP) customer protections implemented by Southwest Gas in response to COVID-19.

On April 16, 2020, the Commission adopted Resolution M-4842 (Resolution M-4842) ratifying the directives issued in the March 17, 2020 Letter from Executive Director Alice Stebbins implementing EDRP customer protections. Resolution M-4842 recognized that “The COVID-19 pandemic represents a different type of emergency, one where the threat – in this case, a virus—necessitates a response which impacts Californians’ ability to pay for utility service...Therefore...the Commission extends to California customers the emergency customer protections from D.19-07-015...through April 16, 2021, with an option to extend.”<sup>1</sup>

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<sup>1</sup> Resolution M-4842, at pgs. 3-4.



All residential and small business customers in California are eligible for the emergency customer protections.<sup>2</sup>

Southwest Gas submitted Advice Letter No. 1130-A in compliance with Resolution M-4842 to establish the COVID-19 Pandemic Protections Memorandum Account (CPPMA) and address new requirements pertaining to EDRP Customer Protections implemented and those not implemented in response to COVID-19, as well as Southwest Gas' Communications and Outreach Plan pertaining to COVID-19. Advice Letter Nos. 1130-B and 1130-C were subsequently submitted to offer additional clarifications and modify the CPPMA.<sup>3</sup>

On February 11, 2021, the Commission adopted Resolution M-4849 extending the customer protection measures for residential and small business customers adopted in D.19-07-015 and D.19-08-025 through June 30, 2021. Pursuant to OP 2 in Resolution M-4849, Southwest Gas submitted Advice Letter No. 1161 demonstrating compliance with the extension of emergency customer protections to support California customers in Southwest Gas' California service territories.

On February 25, Southwest Gas submitted its Draft Advice Letter to Energy Division staff pursuant to OP 6 in Resolution M-4849, so that it may be reviewed for compliance with the customer protection measures adopted in D.19-07-015 and D.19-08-025, and Resolutions M-4842 and M-4849, and also so that the Energy Division may share the utilities' Advice Letters with the Low Income Oversight Board who may also offer their recommendations. Directives from the Energy Division were subsequently distributed to the Small and Multi-Jurisdictional Utilities (SMJU), including Southwest Gas, on March 22, 2021. The LIOB provided their recommendations on March 24, 2021.

OP 5 in Resolution M-4849 requires electric, gas and water utilities to file transition plans for the expiration of Emergency Customer Protections by April 1, 2021. The transition plans shall include 1) a timeline of new start and resumed activities, 2) a marketing, education and outreach (ME&O) strategy, 3) an explanation of the activities timeline and ME&O strategy accounts for compliance and safety, and 4) a progress tracking and reporting plan. The goal of the transition plan is to proactively enroll customers in programs to manage their utility bills and inform relevant customers of the changes to programs they are already on, to effectively ease customers through a transition off of Emergency Customer Protections.<sup>4</sup>

On April 1, 2021, Southwest Gas submitted Advice Letter No. 1170 in compliance with Resolution M-4849, OP 5.

Southwest Gas is submitting this partial supplement at the request of the Energy Division to address: 1) the timing and incremental budget for Marketing, Education and Outreach efforts; 2) potential Federal relief funds available to assist Southwest Gas customers to pay their natural gas bill; and 3) Compliance and Safety, including arrearage data.

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<sup>2</sup> *Id.*, at pg. 4.

<sup>3</sup> The referenced Advice Letters were approved by the Energy Division on December 16, 2020, effective March 4, 2020.

<sup>4</sup> Resolution M-4849 at pg. 34.



## **MARKETING, EDUCATION AND OUTREACH (ME&O)**

### Timing of ME&O

In Advice Letter No. 1170, Southwest Gas provided the following timeline for “Transition to Business as Usual”:

<b>Date</b>	<b>Activity</b>
July 1, 2021	Re-institute third party collections activity (charged off/closed accounts).
August 1, 2021	<ul style="list-style-type: none"><li>• Re-instate billing late payment charges and re-establishment deposits</li><li>• Southwest Gas will continue through at least December 31, 2021 to waive fees or deposits upon customer request if they advise us that they are COVID impacted.</li></ul>
September 1, 2021	<ul style="list-style-type: none"><li>• Re-instate disconnections for non-payment</li><li>• Southwest Gas will not disconnect a customer, who has informed us they are COVID-19 impacted, through at least December 31, 2021.</li></ul>
October 1, 2021	Begin sending recertification and random income verification request letters to CARE customers.
December 2021	Begin removing customers from the CARE program, who do not complete recertification or income verification requirements

To effectively outreach to its customers regarding the above transition from COVID-19 emergency customer protections, Southwest Gas’ proposed messaging, messaging channels and timing included in Advice Letter No. 1170 are provided below. Southwest Gas has provided additional clarifications in ***bold italics***.

- Messaging ***to all customers*** will reference the end of COVID-19 customer protections as of June 30, 2021, including:
  - Late Payment Charge re-instatement;
  - Re-establishment deposit re-instatement; and
  - Service disconnection re-instatement.
- The following targeted messaging for CARE customers around recertification and income verification requirements will be implemented:
  - September 2021 – begin targeted CARE bill messages; and
  - October 2021 – begin mailing letters to CARE customers requesting recertification and income verification.
- ***Southwest Gas will also target the following customers:***
  - ***Customers with arrears;***
  - ***Customers enrolled in deferred payment arrangements;***
  - ***Medical Baseline customers; and***
  - ***Customers in disadvantaged communities (these communities primarily exist in Southwest Gas’ Southern California service territory).***



- **Outreach** channels and timing include the following, **to be provided in both English and Spanish**:
  - June 2021 – begin general bill messages;
  - June 2021 – post website messaging throughout swgas.com;
  - June 2021 – begin messaging through Opower Energy Savings Portal targeting low income customers; and
  - **Southwest Gas will also perform the following**:
    - **June/July 2021 – email blasts and direct mail, as necessary**
    - **June/July 2021 – social media postings.**

#### ME&O Regarding Federal Relief Funds

Southwest Gas Customer Assistance will continue to refer customers to 2-1-1, which identifies where a caller is located and provides referrals to various agency funding assistance programs, including those that may offer federal funding assistance. Southwest Gas will also include information regarding 2-1-1 on its website at swgas.com.

#### ME&O Incremental Costs/Budgets

Resolution M-4849 states:

If an IOU estimates that it cannot both comply with this Resolution and maintain compliance with existing Decision mandates leveraging only existing authorized budgets, it shall note in its Advice Letter the cost estimate, with details of the incremental new activity, and use the memorandum account to record and track incremental costs associated with transition plan implementation.<sup>5</sup>

Southwest Gas' proposed ME&O plan includes methods that are no cost or low-cost and anticipates using its existing budgets for implementation of its plan. However, to the extent that incremental ME&O costs are incurred, Southwest Gas proposes to track these costs in its COVID-19 Pandemic Protections Memorandum Account.

#### **COMPLIANCE AND SAFETY**

As noted above, Southwest Gas submitted Advice Letter Nos. 1130-A, 1130-B and 1130-C in compliance with Resolution M-4842 to establish the COVID-19 Pandemic Protections Memorandum Account (CPPMA), address new requirements pertaining to EDRP Customer Protections implemented and those not implemented in response to COVID-19, as well as Southwest Gas' COVID-19 Communications and Outreach Plan. These Advice Letters were effective March 4, 2020 and since that time, Southwest Gas has complied with Resolution M-4842 with the ongoing implementation of the following COVID-19 Emergency Customers Protections:

- Moratorium on service disconnects;
- Suppression of late fees;

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<sup>5</sup> Resolution M-4849 at pg. 17.



- Suppression of re-establishment deposits;
- Suspension of CARE program removals for residential customers, as well as suspended recertification and income verification requests for CARE customers;
- Suspension of recertification requests for Medical Baseline Allowance program; and
- Updated bill and disconnect notice language to remove “turn off” and “disconnect”.

In addition, Southwest Gas submitted Advice Letter No. 1161 in compliance with Resolution M-4849 to extend the above protections through June 30, 2021.

Southwest Gas will additionally continue efforts to promote the CARE Program to its low-income customers in order to meet Southwest Gas’ annual CARE Program targets.

Furthermore, Southwest Gas will continue to monitor state and local COVID-19 health orders and governmental directives to ensure the safety of Southwest Gas employees and customers. However, Southwest Gas will consult with the Energy Division, as necessary, should it determine that implementation of certain aspects of this transition plan may be delayed in order to protect its employees and customers.

#### Arrearage Data

Resolution M-4849 directs the small and multi-jurisdictional utilities to report the following for their entire geographic region:

- 1) The number and percent of unique customers who are:**
  - a. More than 90 days in arrears; and**
  - b. Not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan.**

Southwest Gas response (for the period ending February 28, 2021):

- Unique residential customers – 531, or 0.28%, meet the above criteria.
  - \$129,141 in total arrears.
- Unique small business customers – 262, or 2.78%, meet the above criteria.
  - \$255,684 in total arrears

- 2) The number and percent of unique customers who are:**
  - a. More than 90 days in arrears;**
  - b. Not enrolled in a Recent Applicable Payment Plan or conventional extended payment plan; and**
  - c. More than \$250 in total arrears.**

Southwest Gas response (for the period ending February 28, 2021):

- Unique residential customers – 197, or 0.10%, meet the above criteria.
  - \$96,845 in total arrears.
- Unique small business customers – 162, or 1.72%, meet the above criteria.
  - \$242,083 in total arrears.



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### **Effective Date**

Pursuant to OP 5 in Resolution M-4849, this Advice Letter is classified as Tier 2 (effective after Energy Division approval) and is subject to Energy Division disposition pursuant to General Order (GO) 96-B. Therefore, Southwest Gas respectfully requests this Advice Letter be made effective on May 1, 2021, which is the same effective date requested in Advice Letter No. 1170.

### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 20 days after the date of this Advice Letter submission and shall be sent by letter via U.S. Mail, facsimile, or electronically mailed. The address for mailing or delivering a protest to the Commission is:

ATTN: Tariff Unit  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
Email: [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)  
Facsimile: 415-703-2200

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004, at the same address as above, and mailed, emailed or faxed to:

Mr. Justin Lee Brown  
Senior Vice President/General Counsel  
Southwest Gas Corporation  
P.O. Box 98510  
Las Vegas, NV 89193-8510  
Email: [justin.brown@swgas.com](mailto:justin.brown@swgas.com)  
Facsimile: 702-364-3446

### **Notice**

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 in GO 96-B since this Advice Letter is submitted in compliance with OP 5 in Resolution M-4849.

### **Service**

In accordance with GO 96-B, General Rule 7.2, Southwest Gas is serving copies of this Advice Letter and related tariff sheet to the utilities and interested parties shown on the attached list. Pursuant to OP 2 in Resolution M-4849, Southwest Gas will also serve this Advice Letter to all individuals on the established service lists in Rulemaking (R.) 18-03-011, Application (A.) 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014.



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Communications regarding this submission should be directed to:

Valerie J. Ontiveroz  
Regulatory Manager/California  
Southwest Gas Corporation  
P.O. Box 98510  
Las Vegas, NV 89193-8510  
Telephone: 702-876-7323  
Email: [valerie.ontiveroz@swgas.com](mailto:valerie.ontiveroz@swgas.com)

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By:   
Valerie J. Ontiveroz

## **Distribution List**

Advice Letter No. 1170-G-A

In conformance with GO 96-B, General Rule 4.3

The following individuals or entities have been served by electronic mail:

Elizabeth Echols, Director  
Public Advocates Office  
[elizabeth.echols@cpuc.ca.gov](mailto:elizabeth.echols@cpuc.ca.gov)

Pacific Gas & Electric Company  
[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

Southern California Gas Company  
[ROrtiz@SempraUtilities.com](mailto:ROrtiz@SempraUtilities.com)

San Diego Gas & Electric Company  
[SDG&ETariffs@SempraUtilities.com](mailto:SDG&ETariffs@SempraUtilities.com)

Robert M. Pocta  
Public Advocates Office  
California Public Utilities Commission  
[robert.pocta@cpuc.ca.gov](mailto:robert.pocta@cpuc.ca.gov)

Nathaniel Skinner  
Public Advocates Office  
California Public Utilities Commission  
[nathaniel.skinner@cpuc.ca.gov](mailto:nathaniel.skinner@cpuc.ca.gov)

Pearlie Sabino  
Public Advocates Office  
California Public Utilities Commission  
[pearlie.sabino@cpuc.ca.gov](mailto:pearlie.sabino@cpuc.ca.gov)





# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City: State:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City: State:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	