



# SOUTHWEST GAS CORPORATION

April 1, 2021

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

(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 Tier 2 Advice Letter pursuant to 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).

### **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 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 Letters 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 1161 demonstrating compliance with the extension of emergency customer protections to support California customers in Southwest Gas' California service territories.

OP 5 in Resolution M-4849 states:

Electric, gas, and water corporations subject to this Resolution shall each file Tier 2 Advice Letter with their 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 (and, in the case of water IOUs, the future expiration of the disconnect moratorium in the Governor's Executive Order N-42-20). Electric and gas corporations shall serve copies of the Advice Letters to R.18-03-011, 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 proceeding service lists, and the service list of any new proceeding established to Address Energy Utility Customer Bill Debt Accumulated During the Coronavirus Pandemic. Water corporations shall serve copies of the Advice Letters to R.18-03-011 and R.17-06-024 proceeding service lists.

Additionally, 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

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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.



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.

## **Transition Plan**

### **Current COVID-19 Emergency Customer Protections**

Current emergency customer protection activities include:

- Moratorium on service disconnects
- Suppression of late fees
- Suppression of re-establishment deposits
- California Alternate Rates for Energy (CARE)
  - Suspended CARE program removals for residential customers, as well as suspended recertification and income verification requests for CARE customers
- Suspended recertification requests for Medical Baseline Allowance program
  - This will remain our process indefinitely
- Updated bill and disconnect notice language to remove “turn off” and “disconnect”

### **Customer Support Through the Pandemic**

COVID-19 Customer Assistance Queue – Southwest Gas customers impacted by COVID-19 may navigate through our automated phone system to speak to a specialist to discuss account assistance

- To best assist customers, associates received specified training on:
  - Flexible payment options
  - Payment assistance programs
  - Agency referrals

Customers will always be able to speak to a trained representative to provide these services, regardless of timeframe.

Post-Call Survey – Southwest Gas customers can opt into a survey after speaking with a representative to provide feedback on their experience

- Survey question asking, “Have you or someone in your household been impacted by COVID-19 and would you like additional information on resources available?”
- Customers who positively respond receive information on flexible payment options, payment assistance programs and agency referrals

Outbound Payment Assistance program – Southwest Gas places outbound calls to customers who are identified as being in arrears and have not called in to speak to a Customer Solutions representative

- Staffed program with COVID-19 Assist Queue representatives
- To date, outbound calls were placed to over 3,000 California customers, with the following results:



- ~1,000 customers were successfully contacted
- ~130 customers were enrolled in CARE
- ~250 customers were provided agency referrals
- ~300 customers were provided flexible payment options

Agency Payments - Southwest Gas works with California agencies launching the multiple channels for assistance and tracking of impacted customers

- To date, Southwest Gas received over \$400,000 in payments assisting ~1,100 customers

### **Post-EDRP Transition to Business as Usual**

Southwest Gas plans to ease customers back into standard business practices starting with our recent initiative of placing customers who are more than 60 days past due and are more than \$20 in arrears on an automated Deferred Payment Arrangement (DPA) for 8 months. This will help customers bring their accounts current over an extended period.

- July 1, 2021
  - Re-institute third party collections activity (charged off/closed accounts).
- August 1, 2021
  - Re-instate billing late payment charges and re-establishment deposits
  - 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.
- September 1, 2021
  - Re-instate disconnects for non-payment
  - Southwest Gas will not disconnect a customer, who has informed us they are COVID-19 impacted, through at least December 31, 2021.
- 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

### **Customer Notifications**

As Southwest Gas begins the gradual transition from emergency customer protections, customers will be notified through multiple channels.

- Messaging 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
  - Service disconnection re-instatement
- Channels and timing include:
  - General bill messages beginning in June 2021



- Website messaging throughout swgas.com beginning in June 2021
- Opower Energy Savings Portal messaging targeted to low income customers beginning in June 2021
- In addition, the following targeted messaging for CARE customers around recertification and income verification requirements will be implemented:
  - Targeted CARE bill messages beginning September 2021
  - Letters requesting CARE recertification and income verification will be mailed beginning in October 2021

### **Customer Reporting and Tracking**

Southwest Gas currently tracks customers reporting COVID-19 impacts and automated deferred payment arrangements, and we will continue providing monthly reporting to the Energy Division for:

- COVID-19 Related Changes in Sales, Uncollectibles, Aging Receivables and Bad Debt
- CARE Reporting

### **Energy Division Directives for the SMJUs**

On March 22, 2021, Energy Division provided their feedback on the SMJUs' transition plans and directed *all*<sup>4</sup> SMJUs to incorporate the following items in order to clearly meet the intent of Resolution M-4849:

- Report number of customers that participate in a payment plan that are 6-months or longer.
- If applicable, please discuss data exchange of low-income customers with water utilities, as directed in Resolution M-4849.
- Discuss leveraging community-based organizations (CBOs) and/or LIHEAP service providers for outreach

#### **Report Number of Customers that Participate in a Payment Plan**

Southwest Gas will track and report the number of customers on DPAs. Southwest Gas requests to include this information in its monthly COVID-19 report described above and will begin reporting this data with its report due in April 2021.

#### **Data Exchange of Low-Income Customers with Water Utilities**

Southwest Gas currently exchanges CARE participant data twice a year with two water utilities, Golden State Water Company (Golden State) and Liberty Utilities (Apple Valley Ranchos Water) Corporation (Liberty), both of which have service territories that overlap with Southwest Gas. Resolution M-4849 indicated that the "IOUs should consider ... increasing the frequency with which energy and water IOUs exchange data on accounts enrolled in

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<sup>4</sup> The Energy Division did not have specific directives for Southwest Gas transition plan.



income-eligible programs so that eligible customers can be targeted for enrollment.” As stated in its comments filed on December 23, 2020 in Rulemaking 17-06-024,<sup>5</sup> Southwest Gas would face significant challenges in implementing the recommendation to perform more frequent data exchanges and modifications to the data share process between energy and water utilities. While this may be feasible for some of the larger energy investor owned energy utilities (IOUs), Southwest Gas’ California service territories, customer base, and low-income assistance program budgets are significantly smaller than those of the large IOUs. Therefore, Southwest Gas seeks to maintain its existing amount of data shares.

#### Leveraging CBOs and/or LIHEAP Service Providers for Outreach

Southwest Gas will notify its CBOs, including contractors for Southwest Gas’ Energy Savings Assistance Program, Energy Share agencies, and non-profit organizations that provide service within its California service territories, of the expiration of COVID-19 emergency customer protections and Southwest Gas’ transition plan, so that these CBOs can assist with educating and addressing questions from Southwest Gas customers. Southwest Gas will also work with Community Action Partnership of San Bernardino County, El Dorado County Human Services Department, and Project GO, Inc., who administer LIHEAP throughout Southwest Gas’ California service territories. To support these efforts, Southwest Gas will provide its CBOs and local LIHEAP agencies with materials that can be distributed to customers on its behalf.

#### **LIOB Recommendations**

On March 24, 2021, the LIOB provided its recommendations on the utilities’ transition plans. Although most of the recommendations were directed to the Commission, Southwest Gas is able to incorporate the following recommendation, in part, in its transition plan:

The LIOB recommends that all transition plans include a 7-day or 168 hour-look-ahead period, where if temperatures are forecasted to be above 100 degrees or below 32 degrees, the household shall not be disconnected. The LIOB requests this to be in effect through December 31, 2021.

Southwest Gas currently does not disconnect customers if the weather is expected to be below 15 degrees the following day. However, based on LIOB’s recommendation, Southwest Gas will adjust the temperature threshold to 32 degrees through December 31, 2021. Southwest Gas believes that its current process of evaluating the weather on a daily basis is more appropriate than a 7-day look-ahead period and recommends to continue this process.

#### **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

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<sup>5</sup> *Comments ff Southwest Gas Corporation (U 905 G) in Response to Administrative Law Judge’s Ruling Directing the Parties to File and Serve Comments on Water Division Staff Report, December 23, 2020, = at pgs. 2-3*



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General Order (GO) 96-B. Therefore, Southwest Gas respectfully requests this Advice Letter be made effective on May 1, 2021, which is thirty (30) days after the date of submission.

### **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: 702-364-3452

### **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

Attachments



## **Distribution List**

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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  
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# 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:  
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## 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                            |                                |