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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

In the Matter of:

AB 32 Implementation: Greenhouse Gases.

Docket 07-OIIP-01

**REPLY COMMENTS
OF
SOUTHWEST GAS CORPORATION
(U 905 G)
ON ALLOWANCE ALLOCATION ISSUES UNDER AB 32**

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Dated: November 14, 2007

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**Reply Comments
Of
Southwest Gas Corporation
(U 905 G)
on Allowance Allocation Issues Under AB 32**

Pursuant to the October 15, 2007 **ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS AND NOTICING WORKSHOP ON ALLOWANCE ALLOCATION ISSUES** (Ruling), Southwest Gas Corporation (Southwest) respectfully submits its Reply Comments.

INTRODUCTION

Southwest, as noted in numerous filings before the Commission, is in a unique situation in California as compared to the major energy utilities. Southwest is a small multi-jurisdictional utility or SMJU in California. Southwest provides natural gas service to only approximately 178,000 customers in the State of California, of which approximately 95 percent (95%) are residential. Southwest does not own any transmission or natural gas storage facilities in California. Southwest's total throughput in California in 2006 was merely 15,000,000 decatherms. As such, Southwest represents only a fraction of the natural gas utility industry in California. Southwest, however, has voluntarily joined the California Climate Action Registry in 2006 and is currently pursuing Certification of its third Greenhouse Gas (GHG) inventory for its operations in the State of California.

DISCUSSION

Southwest has reviewed the numerous comments submitted in this docket by the various parties in accordance with the October 15, 2007 Administrative Law Judge's Ruling. Southwest has identified three concepts addressed in the comments which it believes merit further examination and potential adoption by the Joint Commissions in its recommendations to the Air Resources Board (ARB). These three concepts are: (1) the natural gas utility sector should not be regulated under a "cap-and-trade" regulatory regime; (2) if a cap-and-trade regulatory regime is ultimately adopted by the ARB, utilities serving end-use customers should be administratively allocated GHG allowances; and (3) the ARB should only seek to regulate GHG produced within the State of California. Each of these concepts is explored in more detail below.

(1) The Natural Gas Utility Sector Should Not be Regulated Under a "Cap-and-Trade" Regulatory Regime.

Southwest agrees with San Diego Gas & Electric's and Southern California Gas Company's comments (page 19, Response 10Gas) as it relates to natural gas distribution companies. According to the Market Advisory Committee (MAC) June 30, 2007 Recommendations for Designing a Greenhouse Gas Cap-And-Trade System for California (MAC Report), fugitive emissions from petroleum and natural gas supply and supply systems comprised only four/tenths of one percent of the total GHG emissions in California (page 109). Thus, emissions from natural gas utilities constitute a minute source of GHG in California, and any additional reduction in those emissions will not likely contribute to the achievement of the aggressive GHG emissions goals set by AB 32.

The combustion of natural gas by end-use customers of natural gas utilities, including residential, commercial and industrial customers, constitutes approximately 11 percent of the total GHG emissions in California according to the MAC Report (Appendix D) and the ratio declines further when industrial customers that would be subject to large point source

reporting/regulation are excluded). In addition, natural gas consumption in California by residential end-use customers has decreased since 1990 (American Gas Association Pre-Hearing Conference Statement in R.06-04-009, filed July 26, 2007, page 4).

Although the emissions from the combustion of natural gas by end-use customers is still substantially greater than the fugitive emissions of GHGs by natural gas utilities, there is little, if any, direct action a natural gas utility can take to reduce the GHG emissions from that source. In fact, the only reasonable method of reducing natural gas end-users' GHG emissions is to reduce the amount of natural gas they consume. This can be accomplished through state and local building and appliance standards, as well as through energy efficiency and energy conservation programs sponsored by various entities, including the natural gas utility.

Therefore, it is Southwest's belief that subjecting natural gas utilities to cap-and-trade emissions regulation will not provide any additional support to achieving the overarching goal of substantial GHG emissions reductions in California. The mandate of more energy efficient construction and the implementation of energy efficiency appliance and retrofit programs for existing end-use customers will provide the same emissions reductions at a lower cost (as explained below).

(2) If a Cap-and-Trade Regulatory Regime Is Ultimately Adopted by the ARB, Utilities Serving End-Use Customers Should be Administratively Allocated GHG Allowances.

Several, if not most, of the parties submitting comments regarding the allowance allocation issues under AB 32, supported an administrative allocation of emissions allowances, at least initially. This is not surprising, as it is clear that utility end-use customers' cost of compliance would be less. As noted earlier, emissions reductions from natural gas utilities' end-use customers can only be reasonably obtained through energy efficiency or conservation. End-use customers would be responsible for funding, through their rates, the cost to the utility of any energy efficiency or energy conservation programs to achieve emissions reductions.

If emissions allowances were allocated via an auction or sale, natural gas utilities would be required to purchase allowances to cover their end-use customers' combustion of natural gas and the resulting GHG emissions. The cost to purchase the allowances would also be recovered from customers through their rates. This would have the effect of end-use customers paying twice to achieve emissions reductions; once for the cost of energy efficiency/conservation programs and again for the cost of the allowances to cover their GHG emissions. This is inherently unfair and does not reduce the cost of the program to customers, particularly low-income customers.

The magnitude of the additional cost to end-use customers could be significant. At the workshop held on November 5, 2007 to address the allowance allocation issues under AB 32, at least one party believed the increase in cost could approach a factor of 10 (\$3 million under administrative allocation versus \$30 million under an auction/sale). Southwest has not done any independent analysis to confirm the relative size of the increased cost to end-use customers. However, intuitively it has to be substantially more, and the magnitude of the additional cost to end-use customers would be determined by the value the marketplace assigned to the emissions allowances.

An additional concern to Southwest, if an auction or sale were used to allocate emissions allowances to utilities, is the potential risk the Commission may entertain a possible disallowance depending on the price the utility actually paid for the allowances. In a competitive market, such as that in place for the natural gas commodity, prices are volatile and fluctuate significantly based on many perceived and real market factors. As such, prices can be either relatively high or low. The use of an auction methodology for allocating emissions allowances assumes a competitive market. If a utility purchased allowances when the market price was high, it would face a risk of disallowance (without significant regulatory promises or guarantees) if the market price were to have declined significantly when it sought recovery of the costs from

customers. Although this risk may seem remote, several parties to this proceeding have recommended disallowances to this Commission when prices of certain commodities have fluctuated and it was believed the utility purchased the commodity at above-market prices or purchased it when it should not have been in the market.

Southwest believes the administrative and free allocation of emissions allowances to utilities is appropriate and will be less costly to its end-use customers.

(3) The ARB Should Only Seek to Regulate GHG Produced Within the State of California.

Throughout this proceeding, there have been several concerns expressed about California's attempt to regulate GHG emissions and the legal and regulatory implications of the Federal Power Act and the dormant Commerce Clause. In fact, much of the discussion and the majority of the contentious issues raised have been related to the importation of power and natural gas from outside the state. It appears that whether a "load-based" or "first-seller" approach to regulation is adopted, it will likely be challenged in the courts, and regulation and reduction of greenhouse gases will be delayed. It also appears that California, by seeking to extend its jurisdiction to out-of-state power production, may unintentionally impede the creation and integration of regional or national GHG initiatives.

Southwest believes there is a fairly simple solution to this dilemma. This solution was brought forth by the Division of Ratepayer Advocates (DRA) in its October 31, 2007 comments (pages 2-5). DRA recommends that the point of regulation be source-based and California regulate in-state generators only. This methodology would ensure that approximately 50 percent of the total GHG emissions associated with California's electricity consumption would be subject to regulation. This methodology would also reduce or remove regulatory and legal problems associated with attempting to regulate out-of-state emissions. Additionally, it would reduce the complexity of any method developed by California to regulate GHG. Finally, this methodology may be more compatible with the adoption of regional or national initiatives

adopted to regulate GHG emissions.

Southwest believes DRA's proposal is reasonable and appropriate and deserves careful consideration by the Joint Commissions.

CONCLUSION

Southwest believes that the Joint Commissions in its recommendations to the Air Resources Board (ARB) should: (1) exempt the natural gas utility sector from regulation under a cap-and-trade regulatory regime; (2) administratively allocate GHG allowances to utilities serving end-use customers, if a cap-and-trade regulatory regime is ultimately adopted by the ARB; and (3) should only seek to regulate GHG produced within the State of California. Southwest appreciates the opportunity to comment and participate in this matter.

Southwest looks forward to continuing to work with the Commission and the other parties in this proceeding to develop reasonable policy recommendations leading to fair and reasonable regulation for the reduction of greenhouse gas emissions in the natural gas sector.

Dated this 14th day of November, 2007 at Las Vegas, Nevada.

Respectfully submitted,

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Certificate of Service

I certify that I have by mail, or by electronic mail, to the parties to which an electronic mail address has been provided, this day served a true copy of the **Reply Comments of Southwest Gas Corporation (U 905 G) on Allowance Issues Under AB 32** on the attached service list to R.06-04-009.

Dated this 14th day of November, 2007, at Las Vegas, Nevada.

/s/ Telma G. Lopez
An employee of Southwest Gas Corporation

R.06-04-009
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