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BEFORE THE ARIZONA CORPORATION COMMISSION

ORIGINAL

COMMISSIONERS
Bob Stump, Chairman
Gary Pierce
Brenda Burns
Bob Burns
Susan Bitter Smith

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CORP COMMISSION
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Arizona Corporation Commission

DOCKETED

JAN 17 2014

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In the Matter of the Commission's Inquiry into Potential Impacts to the Current Utility Model Resulting from Innovation and Technological Developments in Generation and Delivery of Energy.

DOCKET NO. E-00000J-13-0375

COMMENTS

WRITTEN COMMENTS OF
SOUTHWEST GAS CORPORATION

Southwest Gas Corporation ("Southwest Gas" or "Company") hereby submits written comments in response to Commissioner Bob Burns' letter regarding innovations and technological developments that could impact the current energy utility model in Arizona, as published on December 5, 2013. Specifically, Commissioner Burns requested comments on the proposed scope and approach of this docket, as detailed in the December 5, 2013 letter.

While the proposal outlined in the letter appears to be reasonable, Southwest Gas submits that a comprehensive assessment of the innovations and technological areas that have the greatest potential to impact the current energy utility model should also include consideration of a full-fuel-cycle energy analysis to ensure a more comprehensive analysis of the total energy and emissions impacts of end-use appliances. A full-fuel-cycle energy analysis measures the total energy efficiency and environmental impact as energy travels from its original source, such as a natural gas well head, to its end-use in the home or business. Such appliances include, without limitation, tankless water heaters and condensing furnaces.

1 Based on the recognized potential impact that the major innovations and
2 technological areas identified by Commissioner Burns may have on other regulated
3 industries, including natural gas, Southwest Gas intends to continue monitoring this
4 docket and will attend the workshops contemplated in the December 5, 2013 letter, as
5 applicable. The innovations and areas outlined in Commissioner Burn's letter that
6 may have an impact on natural gas include: distributed supply resources – such as
7 distributed generation and the use of fuel cells; compressed natural gas (CNG) and
8 hybrid vehicles – as alternatives to plug-in electric vehicles; and the potential impact
9 metering technology and services may have on facilities utilizing cogeneration.

10 Southwest Gas looks forward to actively participating in this docket and working
11 with the Arizona Corporation Commission and all other interested parties to provide
12 additional ideas and concepts that address the issues identified by Commissioner
13 Burns and to further explore the considerations identified herein.

14 Dated this 17th day of January 2014.

15 Respectfully submitted,

16 SOUTHWEST GAS CORPORATION

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