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SOUTHWEST GAS CORPORATION

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November 21, 2014

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

NOV 21 2014

DOCKETED BY 

Steve Olea, Director
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2996

Dear Mr. Olea:

Re: **Docket No. G-01551A-04-0876; Decision No. 68487**

Pursuant to Commission Decision No. 68487 (Finding of Fact #40) issued in Docket No. G-01551A-04-0876, Southwest Gas Corporation (Southwest Gas) is required to provide the Arizona Corporation Commission Staff a copy of Southwest Gas' initial filing in any new FERC docket which relates to Southwest Gas' service in Arizona.

Respectfully submitted,

Matt Derr
Regulatory Manager/Arizona

Cc: Bob Gray, ACC Utilities Division
Brian Bozzo, ACC Compliance Manager

UNITED STATES OF AMERICA
Before the
FEDERAL ENERGY REGULATORY COMMISSION

El Paso Natural Gas Company L.L.C.)

Docket No. RP15-121-000

MOTION TO INTERVENE
OF SOUTHWEST GAS CORPORATION

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. Section 385.214, and the Commission's notice issued in the above-captioned proceeding on November 3, 2014, Southwest Gas Corporation ("Southwest") hereby moves to intervene in this proceeding with all rights of a party.

In support hereof, Southwest shows as follows:

I.

It is requested that all correspondence or communications with respect to this proceeding be sent to each of the following:

* Laura Hagle, Manager
Federal Regulatory Affairs
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
(702) 876-7313
laura.hagle@swgas.com

* Keith A. Layton
Associate General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
(702) 876-7107
keith.layton@swgas.com

* Douglas M. Canter, Esq.
Post & Schell, P.C.
Suite 600
607 14th Street N.W.
Washington, DC 20005-2006
(202) 661-6957
DCanter@PostSchell.com

Pamela Ruckel, Senior Analyst
Federal Regulatory Affairs
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
(702) 364-3047
pamela.ruckel@swgas.com

* Designated for receipt of official service.

II.

Southwest is a natural gas local distribution company engaged in, *inter alia*, the intrastate transmission, distribution, and sale of natural gas in certain portions of the states of California, Arizona, and Nevada pursuant to certificates of public convenience and necessity issued by the California Public Utilities Commission, the Arizona Corporation Commission, and the Public Utilities Commission of Nevada.

Southwest relies upon El Paso Natural Gas Company, LLC ("El Paso") for the transportation of a portion of its natural gas supplies in Arizona. Southwest is a firm transportation customer of El Paso.

III.

On October 31, 2014, El Paso submitted for filing in Docket No. RP15-121-000, tariff records to reflect updates associated with the permanent release of capacity of several non-conforming firm transportation service agreements ("TSAs"). Mex Gas Supply, S.L. ("Mex Gas") is relinquishing its business of acquiring gas supplies in the United States for Comisión Federal de Electricidad ("CFE") and transferring to CFE several El Paso TSAs. El Paso is adding tariff records showing two CFE TSAs which include non-conforming provisions contained in the related Mex Gas TSAs. Six Mex Gas TSA references and related tariff records are being removed from El Paso's Tariff to reflect the removal of the Mex Gas TSAs. In light of the expedited timing of the permanent capacity releases, El Paso requests the Commission to accept the tendered tariff records to become effective November 1, 2014.

IV.

As a customer of El Paso, Southwest is dependent upon El Paso for supplies of natural gas and is subject to the rates that the Commission authorizes El Paso to collect for its transportation of gas. An order in this proceeding may have a direct impact upon Southwest. Southwest thus has an interest which will be directly affected by the outcome of this proceeding. Southwest's interest cannot be adequately represented by any other party in this proceeding.

Southwest requests intervention so that it may appropriately represent its interests as circumstances warrant in this proceeding. Southwest requests the right to participate fully as a party in any conferences, hearings, or other proceedings which may be convened herein.

V.

WHEREFORE, Southwest requests that it be permitted to intervene in this proceeding with full rights of a party.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: /s/ Keith A. Layton
Keith A. Layton
Associate General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
(702) 876-7107
keith.layton@swgas.com

November 12, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Commission in this proceeding.

Dated at Las Vegas, Nevada, this 12th day of November 2014.

/s/ Keith A. Layton

Keith A. Layton
Associate General Counsel
Southwest Gas Corporation
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Document Content(s)

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**UNITED STATES OF AMERICA
Before the
FEDERAL ENERGY REGULATORY COMMISSION**

Comisión Federal de Electricidad

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Docket No. RP15-147-000

**MOTION TO INTERVENE
OF SOUTHWEST GAS CORPORATION**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. Section 385.214, and the Commission's notice issued in the above-captioned proceeding on November 5, 2014, Southwest Gas Corporation ("Southwest") hereby moves to intervene in this proceeding with all rights of a party.

In support hereof, Southwest shows as follows:

I.

It is requested that all correspondence or communications with respect to this proceeding be sent to each of the following:

* Laura Hagle, Manager
Federal Regulatory Affairs
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
(702) 876-7313
laura.hagle@swgas.com

* Keith A. Layton
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* Douglas M. Canter, Esq.
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Pamela Ruckel, Senior Analyst
Federal Regulatory Affairs
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
(702) 364-3047
pamela.ruckel@swgas.com

* Designated for receipt of official service.

II.

Southwest is a natural gas local distribution company engaged in, *inter alia*, the intrastate transmission, distribution, and sale of natural gas in certain portions of the states of California, Arizona, and Nevada pursuant to certificates of public convenience and necessity issued by the California Public Utilities Commission, the Arizona Corporation Commission, and the Public Utilities Commission of Nevada.

Southwest relies upon El Paso Natural Gas Company, LLC ("El Paso") for the transportation of a portion of its natural gas supplies in Arizona. Southwest is a firm transportation customer of El Paso.

III.

On November 3, 2014, Comisión Federal de Electricidad ("CFE") submitted for filing in Docket No. RP15-147-000, a Petition for Clarification Regarding Continuation of Prior Authorization of Gas Supply and Transportation Arrangements for El Paso Natural Gas Company, L.L.C.'s ("El Paso") Samalayuca Lateral. In Docket No. RP14-1252-000, MexGas Supply, S.L. ("MexGas") and CFE requested and were granted temporary waivers of the Commission's capacity release provisions and El Paso tariff provisions to allow a capacity transfer from MexGas to CFE. CFE seeks clarification that the prior authorization by the Commission for the various gas supply and transportation arrangements on behalf of the CFE applicable to the Samalayuca Lateral will continue after the underlying transportation capacity gets released by MexGas to CFE. CFE requests the Commission issue an order granting the requested clarification by November 30, 2014.

IV.

As a customer of El Paso, Southwest is dependent upon El Paso for supplies of natural gas and is subject to the rates that the Commission authorizes El Paso to collect for its transportation of gas. An order in this proceeding may have a direct impact upon Southwest. Southwest thus has an interest which will be directly affected by the outcome of this proceeding. Southwest's interest cannot be adequately represented by any other party in this proceeding.

Southwest requests intervention so that it may appropriately represent its interests as circumstances warrant in this proceeding. Southwest requests the right to participate fully as a party in any conferences, hearings, or other proceedings which may be convened herein.

V.

WHEREFORE, Southwest requests that it be permitted to intervene in this proceeding with full rights of a party.

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: /s/ Keith A. Layton
Keith A. Layton
Associate General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
(702) 876-7107
keith.layton@swgas.com

November 13, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Commission in this proceeding.

Dated at Las Vegas, Nevada, this 13th day of November 2014.

/s/ Keith A. Layton

Keith A. Layton
Associate General Counsel
Southwest Gas Corporation
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