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**SOUTHWEST GAS CORPORATION**

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2016 SEP -7 P 12:49

September 7, 2016

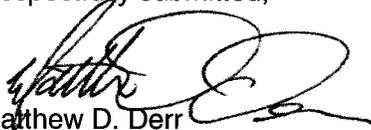
Arizona Corporation Commission  
Docket Control  
1200 West Washington Street  
Phoenix, AZ 85007-2996

**Re: Docket No. G-01551A-16-0107**

Southwest Gas Corporation respectfully submits the attached motion to accept late-filed opposition to Pinal Energy, LLC's motion to intervene in the above referenced docket.

If you have any questions, please do not hesitate to contact me at 602-395-4058.

Respectfully submitted,

  
Matthew D. Derr  
Regulatory Manager/Arizona

Cc: Service List

Arizona Corporation Commission

**DOCKETED**

SEP 07 2016

DOCKETED BY 

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **COMMISSIONERS**

3 **Doug Little, Chairman**

4 **Bob Stump**

5 **Bob Burns**

6 **Tom Forese**

7 **Andy Tobin**

8 In the Matter of the Application of Southwest  
9 Gas Corporation for the Establishment of Just  
10 and Reasonable Rates and Charges Designed  
11 to Realize a Reasonable Rate of Return on the  
12 Fair Value of the Properties of Southwest Gas  
13 Corporation Devoted to Its Arizona Operations

DOCKET NO. G-01551A-16-0107

14 **MOTION TO ACCEPT LATE-FILED OPPOSITION TO PINAL ENERGY, LLC'S**  
15 **MOTION TO INTERVENE**

16 Pursuant to Sections R14-3-101(B) and R14-3-105 of the Arizona Administrative Code  
17 (A.A.C.), Rule 6(b) of the Rules of Civil Procedure for the Superior Court of Arizona, and  
18 the Procedural Order issued June 27, 2016 in the instant docket, Southwest Gas  
19 Corporation (Southwest Gas or Company) hereby submits to the Arizona Corporation  
20 Commission (Commission) its Motion to Accept a Late-Filed Opposition to the Motion to  
21 Intervene, filed by Pinal Energy, LLC (Pinal). The Company's Opposition to the Motion to  
22 Intervene (Opposition) is being filed simultaneously with this Motion.

23 Pinal filed its Motion to Intervene September 1, 2016. Pursuant to the Procedural  
24 Order, Southwest Gas' response to Pinal's Motion to Intervene was due to the Commission  
25 September 6, 2016. See, Procedural Order at pg. 4, ll. 18-19. Due to the Labor Day holiday,  
26 this afforded Southwest Gas only two business days – the day immediately following the  
27 filing and the day the response was due, to review Pinal's filing, deliberate internally and  
28 prepare a response. This expedited timeframe was further compounded by the fact that  
counsel for the Company had a pre-planned absence from the office from September 2  
through September 6, 2016.

Despite the Company's good faith efforts, it was not able to finalize and file its Opposition  
on September 6, 2016. Upon realizing that Southwest Gas would be unable to meet the

1 deadline, counsel for the Company contacted Pinal's counsel and requested a brief  
2 extension of time, not to exceed three calendar days. The Company's request was denied.

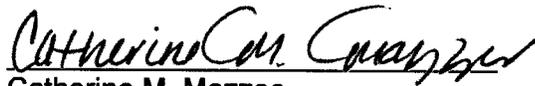
3 As Southwest Gas' Opposition goes directly to the appropriateness of Pinal's proposed  
4 participation in this docket, it is in the public interest that the Company's Opposition be  
5 accepted and considered, and that the Motion to Intervene be decided on the merits. While  
6 Southwest Gas regrets any inconvenience the delayed filing may have caused, no party to  
7 this proceeding will be prejudiced by the acceptance of the Company's Opposition one day  
8 beyond the deadline prescribed by the Procedural Order, and acceptance of the Opposition  
9 will not impact any dates set forth in the Procedural Order. Further, Southwest Gas is not  
10 opposed to allowing Pinal an additional day to file any reply to the Opposition.

11 Based on the foregoing, Southwest Gas respectfully requests that its Motion be  
12 granted, and the attached Opposition be accepted for filing.

13 Dated this 7<sup>th</sup> day of September, 2016.

14 Respectfully submitted,

15 SOUTHWEST GAS CORPORATION

16 

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24 *Attorney for Southwest Gas Corporation*

1 An Original and 13 copies of the foregoing  
2 were filed this 7<sup>th</sup> day of September, 2016, with:

3 Docket Control  
4 Arizona Corporation Commission  
5 1200 West Washington Street  
6 Phoenix, AZ 85007

7 Copies of the foregoing were hand-delivered or mailed  
8 this 7<sup>th</sup> day of September, 2016, to:

9 Dwight D. Nodes  
10 Chief Administrative Law Judge  
11 Hearing Division  
12 Arizona Corporation Commission  
13 1200 West Washington Street  
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an employee of Southwest Gas Corporation