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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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2017 MAR -3 P 4: 38

Arizona Corporation Commission

DOCKETED

MAR 3 2017

DOCKETED BY
GB

In the Matter of the Development of New
Transparency and Disclosure Rules.

DOCKET NO.: RU-00000A-17-0035

COMMENTS

On February 7, 2017 and February 15, 2017, Commissioner Burns submitted letters in the above-referenced docket, seeking comments on political contributions and other issues, including campaign contributions to Arizona Corporation Commission (Commission) candidates and other elected officials. In response to Commissioner Burns' letters, Southwest Gas Corporation (Southwest Gas or Company) provides the following comments:

On October 23, 2015, Southwest Gas filed a letter in Docket No. AU-00000A-15-0309 stating in pertinent part that, "...the Company has not financially contributed to campaigns concerning Arizona Corporation Commission candidates and it does not intend to deviate from this practice." Indeed, Southwest Gas continues to adhere to this practice, and did so throughout the 2016 election cycle.

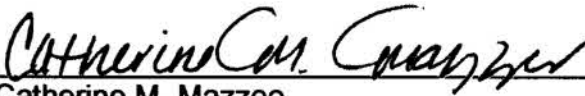
Southwest Gas has a long-standing history of good corporate citizenship and being engaged in the communities we serve. The Company maintains numerous employee giving programs – where employees are provided opportunities to volunteer either their time or their financial resources to various 501(c)(3) organizations. The Company also makes philanthropic charitable contributions to various 501(c)(3) organizations through the Southwest Gas Foundation. Southwest Gas also periodically engages on issues that may have an impact on its business operations and/or its ability to continue to provide safe and reliable service to its customers. This is typically done through registered lobbyists or by

1 financially supporting certain federal, state, and local candidates (with the exception of
2 Commission candidates) through either its state or federal political action committees. The
3 Company has historically not sought to recover these types of expenditures through rates.

4 Southwest Gas' marketing and advertising efforts are primarily targeted at customer
5 education about natural gas safety and various Company programs and services that
6 benefit customers, including energy efficiency and the Customer-Owned Yard Line (COYL)
7 program. To the extent the Company incurs other marketing and advertising expenses, it
8 has not sought to recover those expenses in rates.

9 Respectfully submitted this 3rd day of March, 2017.

10 SOUTHWEST GAS CORPORATION

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