



SOUTHWEST GAS CORPORATION

March 25, 2020

Tom Belshe
Executive Director
League of Arizona Cities and Towns
1820 W. Washington Street
Phoenix, Arizona 85007

Dear Mr. Belshe,

As our state and country continues to grapple with the unprecedented circumstances surrounding the COVID-19 outbreak, we applaud the actions municipal leaders are taking to protect the health and wellbeing of their employees and the general public at large.

As you know Southwest Gas' commercial and residential customers depend on our services for their business and home-comfort needs. We are writing to you to ask for your assistance in conveying to your members the following issues for consideration as they continue to contemplate new operating procedures in response to the ongoing pandemic. It is of critical importance that any temporary policies implemented provide minimal disruption to our business practices so that we can continue to ensure the highest levels of safety, service and reliability for our customers.

Right of Way Treatments

Southwest Gas strives to work with our local government partners to coordinate our work in the rights-of-way as much as possible and minimize our need to cut freshly treated pavement. If paving schedules become impacted by changes to city or town operations, we would respectfully ask to be notified so that we can expedite or delay our work to the extent possible.

Municipal Curfews

Southwest Gas' facilities are considered critical infrastructure by the United States Department of Homeland Security. Additionally, earlier this week in Executive Order 2020-12, "Prohibiting the Closure of Essential Services," Governor Doug Ducey affirmed that infrastructure operations, including the operation and maintenance of utilities, are essential functions during the COVID-19 public health emergency. Maintaining access to our facilities at all times is essential to our ability to operate a safe and reliable system. In the event cities or towns consider a curfew, we would respectfully request that Southwest Gas be issued a waiver from those requirements.



Plan Review, Permitting, Inspection and Traffic Control Review

As cities and towns consider changes to normal staffing and hours of operation at city/town halls, Southwest Gas respectfully asks for arrangements to be made to ensure that plan review, permitting, inspection and traffic control review services can continue to facilitate our work in municipal rights of way. Without these services, Southwest Gas will be unable to complete franchise, O&M and new business work. Please find additional specific concerns below:

- E-Commerce: Southwest Gas encourages municipalities to offer services, like permitting, online to promote social distancing and limit unnecessary in-person interaction to the extent possible.
- Payment processing for permit issuance - If in-person or online payment processing options are not available, alternative payment methods (monthly invoicing, etc.) may be required.
- Emergency permitting: In addition to permitting for planned work, cities and towns must be cognizant of how policy changes will affect processes surrounding emergency work, as many municipalities have specific requirements related to notification and retroactive permitting.
- Green tag inspections - Before establishing or reestablishing gas service at a home or business, cities and towns must perform an inspection and “green tag” a building. If this type of inspection cannot be performed, we will be unable to provide our essential service to businesses and residents.

Southwest Gas' Response to COVID-19

Safety is of the utmost importance at Southwest Gas. In addition to ensuring a safe and reliable pipeline network that delivers natural gas to our customers, we are also taking measures to protect Arizonans' well-being as we face the continued spread of the coronavirus, or COVID-19.

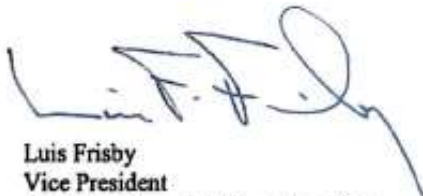
To that end, Southwest Gas continues to implement best practices and follow guidance provided by the Center for Disease Control, our local health organizations, as well as the American Gas Association. To give customers the peace of mind when we meet them face-to-face, we are also enhancing operational procedures for customer-facing employees like our service technicians, emergency response staff and payment office employees. These procedures include wearing gloves, not shaking hands and maintaining a reasonable distance from customers.



We understand that these are trying times for many of our customers and want to ensure that Arizonans focus on the well-being of their families without having to worry about any disruption of service from Southwest Gas. As such, we have stopped service disconnections indefinitely, until the coronavirus situation improves. For customers experiencing financial hardship, we are here to help with flexible payment options.

Southwest Gas truly appreciates the strong working relationship we enjoy with the League of Arizona Cities and Towns and our municipal partners across the state. We are grateful for the leadership municipalities are showing to stop community spread of COVID-19 and help mitigate the impacts of this virus on Arizona. Thank you in advance for your consideration of our request. Please feel free to contact Southwest Gas' Public Affairs Manager, Matt Ligouri, at Matthew.Ligouri@swgas.com or (480) 404-8527 if you have questions about anything contained in this letter.

Respectfully,



Luis Frisby
Vice President
Central Arizona Division Operations



Julie Williams
Vice President
Southern Arizona Division Operations