



October 8, 2026

Arizona Corporation Commission

Re: Southwest Gas Rate Case, **Docket G-01551A-26-0018**

Dear Commissioners:

On behalf of the Arizona Public Health Association, I urge you to deny Southwest Gas's proposed rate increase, *reject* its proposed formula rate mechanism, and *require developers to pay the costs of extending gas infrastructure to serve their projects*.

Affordable energy is public health infrastructure. Families need reliable utility service to maintain safe homes, prepare meals, and meet basic daily needs. When utility bills rise faster than household incomes, families must make difficult choices about food, housing, prescriptions, and medical care. Those tradeoffs have consequences for health.

Southwest Gas is requesting approximately \$101 million in added annual revenue. The company estimates its proposal would increase the average residential customer's bill by 10.69%. That request follows its most recent Arizona rate adjustment in March 2025.

The Commission should consider what another increase means for families already struggling with housing, groceries, healthcare, and other utility bills. Looking at each rate case in isolation misses the cumulative pressure on household budgets.

These pressures fall hardest on people with low incomes, older adults living on fixed incomes, and people with disabilities or chronic illnesses. A household budget stretched by higher utility bills leaves less money for nutritious food, transportation to medical appointments, and medications. Financial strain also creates stress and can make it harder to keep stable housing.

Safe and reliable gas services require investment. But spending money does not automatically mean that customers should pay for it.

Southwest Gas should demonstrate that each investment was necessary, reasonably priced, and beneficial to the customers being asked to finance it.

The Commission should distinguish essential maintenance and safety improvements from expansion designed to serve new development. Developers should pay the full incremental cost of extending infrastructure to their projects. Existing customers should not have to subsidize that expansion through higher bills, especially when they are already struggling to afford essential services.

I also oppose Southwest Gas's proposed annual rate-adjustment mechanism. The company describes this proposal as a way to recover changes in its cost of service each year. My concern is that formula rates would weaken the scrutiny and meaningful public participation that a full rate case provides.

Customers deserve accessible opportunities to question spending, challenge assumptions, and explain how proposed increases would affect their lives. Those voices help commissioners understand consequences that utility financial statements cannot capture.

Before approving higher rates, the Commission should require clear evidence of customer benefits, examine less costly alternatives, and assess the effect on households least able to absorb another increase. Customer assistance programs are valuable, but they do not replace the Commission's responsibility to prevent unjustified costs.

Please deny this request, reject formula rates, and stop shifting development costs onto existing customers. Protecting ratepayers also protects the health and financial stability of Arizona families.

Sincerely,

A handwritten signature in black ink, appearing to read 'Will Humble', with a long, sweeping horizontal stroke at the end.

Will Humble, MPH
Executive Director, Arizona Public Health Association
Director, Arizona Department of Health Services (2009–2015)