

1 The amendment proposed by the Solar Parties would state:

2 (3c) In addition to the action plan requirements set forth at
3 Section 7(3)(b)(1-7), for construction and expansion of
4 transmission infrastructure that will serve both Nevada retail
5 ratepayers and non-Nevada export markets, the action plan
6 must include:

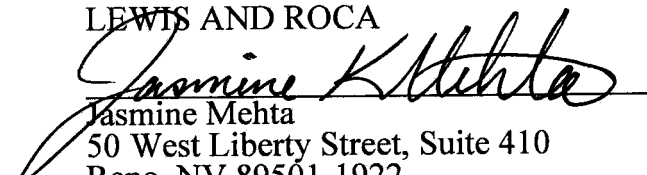
7 (1) Evidence that renewable energy developers wishing to
8 export energy *have a buyer for their energy and the buyer has a*
9 *means of delivering the energy from the point of delivery to the*
10 *ultimate customers;*

11 This language provides that the developer have a means for delivery of the renewable
12 energy, but avoids confusion stemming from the definition of “firm” transmission rights. It
13 also comports with the CAISO interconnection process, rather than requiring the developer
14 actually deliver the energy to the load.¹

15 In an effort to reach a consensus, the Solar Parties and BCP conversed regarding this
16 issue. While the above language does not reflect a consensus draft with BCP, the Solar
17 Parties would welcome the opportunity to meet further with BCP and the other docket
18 participants and discuss this issue further in an effort to arrive at a consensus.

19 RESPECTFULLY SUBMITTED this 30th day of April, 2010.

20 LEWIS AND ROCA

21 
22 Jasmine Mehta
23 50 West Liberty Street, Suite 410
24 Reno, NV 89501-1922
25 Attorneys for Large-Scale Solar Association

26 /s

27 Jim Baak
28 The Vote Solar Initiative
29 300 Brannan St., Suite 609
30 San Francisco, CA 94107

31 _____
32 ¹ While we have limited our comments to this specific section and proposed language
33 modification, the Solar Parties incorporate by reference the concerns stated in their April
34 22, 2010 supplemental comments.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all parties of record in this proceeding by electronic mail to the recipient's current electronic mail address or mailing a true copy thereof, properly addressed with postage prepaid or forwarded as indicated below to:

Rebecca Harold
Regulatory Operations Staff
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701-3109
rebharold@puc.state.nv.us
pucn.sc@puc.state.nv.us

Anna Penrose-Levig
Administrative Attorney
Public Utilities Commission
1150 E. William Street
Carson City, NV 89701-3109
alevig@puc.state.nv.us

Donald Lomoljo
Staff Counsel
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701-3109
dlomoljo@puc.nv.gov

Sierra Pacific Power Company
Connie Silveira
Patti Pastrell
P.O. Box 10100
Reno, Nevada 89520
csilveira@sppc.com
ppastrell@sppc.com

Michael Saunders
Nevada Attorney General
Bureau of Consumer Protection
555 E. Washington St., Ste 3900
Las Vegas, NV 89101
misaunders@ag.nv.gov
bcpserv@ag.nv.gov

Paul Stuhff
Nevada Attorney General's Office
Bureau of Consumer Protection
100 N. Carson Street
Carson City, NV 89701
bcpserv@ag.nv.gov

Jim Baak
Annie Carmichael
The Vote Solar Initiative
300 Brannan Street, Suite 609
San Francisco, CA 94107
jbaak@votesolar.org
annie@votesolar.org

Douglas Brooks
Assistant General Counsel
NV Energy
6226 W. Sahara Avenue
Las Vegas, NV 89146
DBrooks@nvenergy.com

Paul Thomsen
Ormat Nevada, Inc.
6225 Neil Road, Suite 300
Reno, Nevada 89511-1136
pthomsen@ormat.com

Joseph Johnson
Sierra Club
935 Sherwood Drive
Reno, Nevada 89509-2234
Jj935@juno.com

1 Charles Benjamin
2 Western Resource Advocates
3 204 N. Minnesota St., Suite 1A
4 Carson City, Nevada 89703
5 cbenjamin@westernresources.org

6 Clay Jensen
7 Brightsource Energy
8 10161 Park Run Drive, Suite 150
9 Las Vegas, Nevada 89145
10 cjensen@brightsourceenergy.com

11 Ellen Allman
12 Terra-Gen Power, LLC
13 9590 Prototype Ct, Suite 200
14 Reno, Nevada 89521
15 eallman@tgpnyc.com

16 Lorraine Paskett
17 First Solar
18 350 W. Washington Street, Suite 600
19 Tempe, Arizona 85281
20 lpaskett@firstsolar.com

21 Stuart Erdheim
22 Classic Solar Energy LLC
23 8363 Sunset Road, Suite 300
24 Las Vegas, Nevada 89113
25 stuarterdheim@gmail.com

26 Russ Cartwright
Interstate Plumbing & Air Conditioning
1506 Glendale Ave.
Sparks, Nevada 89431
rcartwright@ipair.com

Christy Morris
RAM Power Inc.
5691 Sierra Rose Drive, Suite B
Reno, Nevada 89511
Christy@ram-power.com

Joshua Bar-Lev
Clay Jensen
Brightsource Energy
1999 Harrison Street, Suite 2150
Oakland, California 94612
jbarlev@brightsourceenergy.com

Jason Geddes
City of Reno
1 East 1st Street, 8th Floor
Reno, Nevada 89505
geddesj@cityofreno.com

Martha Ashcraft
Law Offices of Martha J. Ashcraft
7251 W. Lake Mead Blvd, Suite 300
Las Vegas, Nevada 89128
mashcraft@ashcraftlawyers.com

Justin Lee Brown
Debra S. Gallo
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, Nevada 89193-8510
Justin.brown@swgas.com
Debra.gallo@swgas.com

Mel Meier
Bureau of Land Management
1340 Financial Blvd
Reno, Nevada 89502
Melmeier@blm.gov

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Steve Wiel
SWEEP
780 Joyce Lane
Incline Village, Nevada 89451
swiel@swenergy.org

Lori Laudien
Goldman, Sachs & Co.
85 Broad Street
New York, New York
lorilaudien@cogentrix.com

Rose McKinney-James
Energy Works
8912 Montego Bay Drive
Las Vegas, Nevada 89117
foursolar@aol.com

Ed Garcia
Kathleen Fellows
Jones Vargas
3773 Howard Hughes Parkway, 3rd Floor
Las Vegas, Nevada 89169
emg@jonesvargas.com
kfellows@jonesvargas.com

Fred Schmidt
Holland and Hart LLP
777 East William St., Suite 200
Carson City, Nevada 89701
fschmidt@hollandhart.com

Regulatory Operations Staff
Public Utilities Commission of Nevada
1150 E. William
Carson City, NV 89701
pucn.sc@puc.nv.gov

Kathleen Drakulich
McDonald Carano Wilson LLP
100 West Liberty Street, 10th Floor, Reno,
Nv 89501
kdrakulich@mcdonaldcarano.com

Nancy Krassner,
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701
nkrassner@puc.state.nv.us

Morgan Baumgartner
R&R Partners, Inc.
615 Riverside Drive
Reno, Nevada 89503
Ashley.damele@rrpartners.com

Patrick Fagan
Allison Mackenzie et al
P.O. Box 646
Carson City, Nevada 89702
pfagan@allisonmackenzie.com

Robert Reeder
Vicki Baldwin
Parsons Behle & Latimer
201 S. Main Street, Ste 1800
Salt Lake City, Utah 84111
frreeder@parsonsbehle.com
vbaldwin@parsonsbehle.com

Trevor Dillard
Manager, Regulatory Services
Sierra Pacific Power Company
6100 Neil Road, M/S S4A35
Reno, NV 89520
TDillard@nvenergy.com

Attorney General's Office
Bureau of Consumer Protection
100 N. Carson Street
Carson City, NV 89701
bcpserve@ag.nv.gov

Kathleen L. Fellows
Jones Vargas
3773 Howard Hughes Parkway
3rd Floor South
Las Vegas, NV 89169
kfellows@jonesvargas.com

1 Timothy K. Shuba
2 Goodwin Procter LLP
3 901 New York Ave., NW
4 Washington, DC 20001
5 tshuba@goodwinprocter.com

Rachel McMahon
Solar Millennium, LLC
1625 Shattuck, Suite 270
Berkeley, CA 94709
Mcmahon@solarmillennium.com

4 NV Regulatory Department
5 NV Energy
6 P. O. Box 98910
7 6226 West Sahara Ave.
8 Las Vegas, Nv 89151
9 regulatory@nvenergy.com

Hatice Gecol
Renewable Energy and Energy Efficiency
101 N. Carson Street, Annex Bldg.
Carson City, Nv 89701
hgecol@renewable.nv.gov

8 Dan Schochet
9 Ram Power Corp.
10 6880 S. McCarran Blvd., Suite 1
11 Reno, NV 89509
12 dan@ram-power.com

Tom Price
Black Rock Solar, Inc.
3450 3rd Street
San Francisco, CA 94124
tom@blackrocksolar.org

12 DATED this 30th day of April, 2010.


An Employee of Lewis and Roca