BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Investigation Regarding the Creation of an Energy Imbalance Market.	Docket No. 11-04025

COMMENTS OF WESTERN RESOURCE ADVOCATES, CLEAN ENERGY PROJECT, INTERWEST ENERGY ALLIANCE, NATURAL RESOURCES DEFENCE COUNCIL, NEVADA CHAPTER OF THE AMERICAN INSTITUTE OF ARCHITECTS, SONORAN INSTITUTE AND VOTE SOLAR

Western Resource Advocates, Clean Energy Project, Interwest Energy Alliance, Natural Resources Defense Council, Nevada Chapter of the American Institute of Architects, Sonoran Institute, and Vote Solar (together Environmental and Clean Energy Stakeholders) [1] submit these comments in response to the Commission's Procedural Order issued June 28, 2013. [2]

In its order, the Commission requests interested parties and NV Energy to update the record in this open investigation. Specifically, the Commission asks parties to list known efforts in the west to assess the costs and benefits of an Energy Imbalance Market ("EIM"), comment on how the costs and benefits of a utility participating in an EIM should be treated for cost recovery, and identify documents that assess how the benefits of an EIM could be increased by transmission expansion/reservation between balancing areas. NV Energy is requested to provide its internal assessments of the costs and benefits of participating in any EIM, its specific assessment of participating in the California

[1] Please refer to each organization's home page for mission statements and priority issue areas. Clean Energy Project, www.cleanenergyprojectnv.org; Interwest Energy Alliance, www.interwest.org; Natural Resources Defense Council, www.nrdc.org; Nevada Chapter of the American Institute of Architects, www.aianevada.org; Sonoran Institute, www.sonoraninstitute.org; Vote Solar, www.votesolar.org; Western Resource Advocates, www.westernresourceadvocates.org.

[2] Public Utilities Commission of Nevada, *Investigation Regarding the Creation of an Energy Imbalance Market*, Procedural Order, Docket No11-04025, June 28, 2013.

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

Independent System Operator ("CAISO")/PacifiCorp EIM, and its evaluation of external studies that show benefits to Nevada from participating in an EIM.[3]

The Environmental and Clean Energy Stakeholders appreciate the leadership of the Nevada Commission in establishing and refreshing this investigation. The Commission's June 28, 2013 request for comments is particularly timely in light of the confluence of current events. The nearing completion of the One Nevada Transmission Line ("ON Line"), the announced acquisition of NV Energy by MidAmerican Energy Holdings Company ("MidAmerican"), the formation of an EIM by PacifiCorp and the CAISO, and the open CAISO EIM stakeholder process provide a unique opportunity to move forward an EIM covering a substantial contiguous footprint in the heart of the interconnection, potentially initiating a snowball-like effect with the outcome that other utilities in the northwest and southwest decide to participate. As has been demonstrated through the extensive evaluations conducted over the past several years, the formation of an interconnection-wide EIM has significant consumer and environmental benefits. An EIM is an important tool to cost-effectively integrate variable renewable energy, efficiently use existing transmission capacity, and enhance operating reliability. As expressed in our first set of comments, we support the formation of an interconnection-wide EIM showing cost savings and reliability benefits.[4]

1. Update on Assessments of Costs and Benefits

Since comments were filed in this docket in September of 2011, significant activity has been undertaken to hone the initial assessment of the costs and benefits of an EIM that were first released in June 2011 and revised in October 2011 by the Western Electricity Coordinating Council ("WECC").[5] Efforts include the activities overseen by the Public Utilities Commissions Energy Imbalance Market Taskforce ("PUC EIM") and three industry-led efforts that grew out of the PUC EIM work product, including the CAISO/PacifiCorp EIM, the Northwest Power Pool Market Assessment and

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[3] Ibid., p.2.

[4] See *Comments of Western Resource Advocates, Nevada Conservation League, Natural Resources Defense Council, Progressive Leadership alliance of Nevada, Nevada Chapter of the American Institute of Architects, and Sonoran Institute* filed in this docket September 30, 2011.

[5] *WECC Efficient Dispatch Toolkit Cost Benefit Analysis Revised*, October 11, 2011. http://www.wecc.biz/committees/EDT/EDT%20Results/EDT%20Cost%20Benefit%20Analysis%20Report%20-%20REVISED.pdf.

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

Coordination Committee ("MC") Initiative and the Southwest Variable Energy Resource Initiative ("SVERI").[6] Recent study work strengthens the case for an interconnection-wide EIM.

Public Utilities Commissions Energy Imbalance Market Taskforce

The PUC EIM formed in late 2011 with the objective of bringing together state regulatory commissions and regulated entities in a multi-state effort to evaluate the costs and benefits to consumers of an EIM.[7] The Commissioners identified three key pieces of information necessary for individual utilities, regulators and other industry participants to effectively evaluate the costs and benefits of an EIM and undertook to have the information developed: (1) individual Balancing Authority area benefits modeled using subhourly data; (2) a specified market design whose costs could be estimated and therefore refined; and (3) market operator start-up and operating cost information for the specified market design, thereby significantly narrowing the range of costs estimated as part of the WECC cost-benefit analysis.

To achieve the goal of quantifying benefits at the Balancing Authority area level, the Department of Energy agreed to fund the National Renewable Energy Laboratory ("NREL") to refine the WECC benefits analysis through subhourly modeling and to parse the benefit results to individual Balancing Authorities. Final results were released in March of 2013.[8] The study confirms the benefits identified by the initial WECC study and identifies an additional $1.3 billion in potential benefits by

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[6] PUC EIM information can be found at http://www.westgov.org/PUCeim/. CAISO/PacifiCorp information can be found at http://www.caiso.com/informed/Pages/StakeholderProcesses/EnergyImbalanceMarket.aspx. NWPP MC Initiative information can be found at http://www.nwpp.org/our-resources/MC-Initiative. SVERI is working with the University of Arizona to develop a website. No central location for SVERI information is currently available.

[7] In October 2011, members of the State and Provincial Steering Committee (SPSC) adopted a statement supporting further evaluation of an EIM on a multistate basis and agreeing to work together. On November 29, 2011, Commissioners from four states sent a letter to the Chair of the SPSC requesting financial assistance in conducting a multistate evaluation effort. The Chair approved funding support and the PUC EIM group was formed with the objective of bringing "together state regulatory commissions and regulated entities in a multi-state effort to evaluate the costs and benefits to consumers of an EIM." The PUC EIM group includes representation from AZ, CA, CO, ID, MT, NV, NM, OR, SD (staff), TX (open) UT, WA and WY.

[8] The results demonstrate the significance of electrical footprint size and subhourly scheduling in reducing operating cost. The study showed an operating benefit of between $146 million and $300 million annually from expanding the electrical footprint resulting in a reduction in variability in load, solar, and wind, and thus a reduction in the output of thermal resources. The study further demonstrated a $1.3 billion annual benefit from moving from hourly scheduling to 10 minute scheduling. A functioning EIM will provide a five minute dispatch. The final report can be found at http://www.nrel.gov/docs/fy13osti/57115.pdf . Links to related studies can be found at http://www.nrel.gov/electricity/transmission/energy_imbalance.html.

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

moving from hour-a-head scheduling to 10-minute scheduling. For NV Energy, the study estimates the annual benefits range from $27 to $37 million.[9]

To develop a specified market design, personnel of Excel Energy teamed with the Southwest Power Pool ("SPP") to develop a straw market design proposal for the western interconnection based on the SPP energy imbalance market. The design was refined through interaction with interested stakeholders. Next, cost proposals were developed by SPP and the CAISO.[10] The CAISO proposal had the unique attribute of pricing market startup and ongoing operating costs on sales volume and MWh, allowing the proposal to accommodate balancing authorities joining individually. In addition, the CAISO proposed to charge no exit fee, providing a low-cost, low-risk approach to EIM market development. Because of the scalability of the proposal, the market could begin with but a single BA.[11]

CAISO/PacifiCorp Energy Imbalance Market

On February 12, 2013, the CAISO and PacifiCorp entered into a memorandum of understanding to create a regional real-time EIM with a five-minute dispatch to be implemented by October 2014.[12] On March 13, 2013, PacifiCorp and the CAISO released a study identifying annual benefits in the range of $21 million to $129 million; startup costs of between $3 million and $6 million and ongoing costs of between $2 million and $5 million.[13] On March 20, 2013, the CAISO Board of Governors approved its management's request to enter into an implementation agreement with

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[9] Nevada Power results plus Sierra Pacific Power results. *Examination of Potential Benefits of an Energy Imbalance Market in the Western Interconnection* , Technical Report NREL/TP-5500-57115, March 2013, p. 74 and p. 83, http://www.nrel.gov/docs/fy13osti/57115.pdf.

[10] The current version of the SPP cost proposal can be found at: http://www.westgov.org/PUCeim/documents/03-15-13WECCrcp.pdf ; the March 29, 2012 version of the CAISO cost proposal can be found at: http://www.caiso.com/Documents/ISOConceptualProposal_PUC-EIM_20120405.pdf ; A January 29, 2013 update is available at http://www.caiso.com/Documents/ISOConceptualProposalClarification_PUC-EIM_20130129.pdf. A document comparing the CAISO and SPP proposals can be found at: http://www.westgov.org/PUCeim/meetings/2013sprg/briefing/04-05-13ProCompare.pdf.

[11] Approximately 7000 MW of participation is required to start the market.

[12] http://www.caiso.com/Documents/ISO-PacifiCorpMOU_Effective20130212.pdf.

[13] http://www.caiso.com/Documents/PacifiCorp-ISOEnergyImbalanceMarketBenefits.pdf.

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

PacifiCorp and to file the agreement with FERC.[14] FERC accepted the implementation agreement June 28, 2013.[15]

The CAISO is seeking participation by other interested utilities prior to going live in October 2014, and on April 4, 2013 it released a market-design, straw proposal and initiated a stakeholder process.[16] The first stakeholder meeting was conducted a week later. The CAISO has taken three sets of comments and is in the process of preparing its third revision. The revised proposal is to be released no later than August 13 and is expected to address governance in addition to market design. The stakeholder process will continue through the fall and will include the development of tariff language. A policy decision by the CAISO Board of Governors to move forward is expected in November 2013.

Northwest Power Pool Market Assessment and Coordination Committee Initiative

Following several months of discussions, in March of 2012 the senior executives of the Northwest Power Pool member utilities agreed to establish and fund the MC to address a number of growing challenges in the region including: (1) the need for additional tools to respond to rapid changes in load and increasing need for balancing capacity driven by increasing penetration of variable generation; (2) the desire to systematically share system diversity, thereby reducing cost and wear on generation resources; and (3) the need for tools to address the increasingly constrained transmission system. The MC formed three subgroups: the EIM Workgroup; the Enhanced Market/Operational Tools ("EMT") Workgroup; and the Governance Subcommittee. The EIM Workgroup sought to assess the benefits of a northwest region stand-alone EIM and to correct what they considered to be errors in how the previous analyses performed for WECC by E3 and for the PUC EIM by NREL were conducted. The Executive Committee directed the MC to quantify a "minimal", conservatively

[14] http://www.caiso.com/Documents/UpdatedDecisionPacifiCorpEnergyImbalanceMarketImplementationAgreement-Memo-Mar2013.pdf

[15] http://www.caiso.com/informed/Pages/StakeholderProcesses/EnergyImbalanceMarket.asp ; under "Relevant EIM Activities"

[16] CAISO, Energy Imbalance Market Design Straw Proposal and Issue Paper, April 4, 2013. http://www.caiso.com/Documents/DesignStrawProposal-IssuePaper-EnergyImbalanceMarket_040413.pdf .

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

achievable EIM benefit.[17] The modeling team implemented this directive by consistently choosing conservative assumptions.[18]

Preliminary results released in April of 2013 identified roughly $40 million in annual benefits with $56.7 million in benefits needed to breakeven based on conservative cost assumptions. Costs were based on restrictive financial assumptions and a greenfield approach to market development with costs significantly larger than the CALISO cost proposal.[19]

After receiving feedback in April 2013 from participants attending a regional EIM forum, the MC undertook additional sensitivities, including an evaluation of the benefit to the NWPP utilities from participating in an interconnection-wide EIM. Preliminary results from the new modeling runs were released in May 2013.[20] Benefits now cluster in the $70 million range with a low of $40.1 million and a high of $90.3 million depending on the sensitivity considered. Significantly, the benefit to the Northwest region from participating in an interconnection-wide EIM exceeds $200 million. The EIM modeling team cautions that "data and model inputs outside the NWPP EIM footprint could not be rigorously vetted by NWPP MC participants, such that results are INDICATIVE ONLY."[21] Final results are expected to be released the first or second week in August, 2013.

Southwest Variable Energy Resource Initiative

SVERI was recently formed by seven southwestern utilities including NV Energy.[22] Its stated mission is to evaluate the likely penetration, locations and operating characteristics of variable energy resources within the Southwest over the next 20 years and to identify tools that may facilitate

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[17] Patrick Damiano (on behalf of the Analysis Team), MC Initiative, *Summary of Preliminary EIM Analysis Results* for Open MC Meeting. Presentation made to Open MC Meeting, Portland, Oregon, April 3, 2013, p. 14. http://www.westgov.org/PUCeim/meetings/2013sprg/briefing/04-03-13EIMpqr.pdf

[18] Ibid., p. 16.

[19] Ibid., pp. 45-46.

[20] Patrick Damiano (on behalf of the Analysis Team), MC Initiative, *Draft Sensitivity Cases and Parsing*, Presentation made to NWPP Members' MC Initiative Open MC Meeting, May 20, 2013. http://www.nwpp.org/user_documents/052013_NWPP_MC_Business_Case_Presentation_-_Open_MC_Meeting_May_20.pdf

[21] Ibid., p. 15.

[22] NV Energy, Imperial Irrigation District, Western Area Power Administration, Arizona Public Service, Salt River Project, Tucson Electric Power, Public Service Company of New Mexico and El Paso Electric.

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

integration while providing customer benefits.[23] The objectives of SVERI include quantifying a 20-year variable resource outlook, determining at what level variable generation becomes problematic for the southwest, monitoring regional EIM efforts, and identifying best options for accommodating variable resources.[24] SVERI participants conclude the resource portfolios of its participants are significantly different from the resource portfolios of other regions in the west, and, therefore, integrating variable renewable resources is not a near-term problem for the southwest, allowing time to further pursue analysis.[25]

The PUC EIM group will host a SVERI webinar sometime this month.

Reliability Benefits

In addition to an assessment of the economic benefits and costs of an EIM, the PUC EIM taskforce sought assistance in evaluating reliability benefits, and FERC offered to undertake this investigation. FERC issued a staff whitepaper in February 2013.[26] A number of qualitative reliability benefits were identified including:

- faster and more precise management of flows across the market footprint;
- proactive management of transmission limits and congestion;
- enhanced opportunities for resources to deliver balancing energy;
- enhanced situational awareness;
- the ability to automatically identify and locate replacement energy to address supply shortfalls to avoid emergency declarations;
- facilitating acquisition of replacement power after available reserve sharing ends;
- reducing the need to manually find replacement power;

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[23] Ed Beck, *Southwest Variable Energy Resource Initiative*, Presentation to PUC EIM Conference, April 8, 2013. p. 3. http://www.westgov.org/PUCeim/meetings/2013sprg/briefing/present/e_beck.pdf or Al Austin, Southwest Variable Energy Resource Initiative, Presentation to Joins MIS-SIS Meeting, WECC Offices, May 16, 2013.

[24] Ibid., p.4.

[25] Ibid., p. 9.

[26] FERC, *Federal Energy Regulatory Commission Staff Paper: Qualitative Assessment of Potential Reliability Benefits from a Western Energy Imbalance Market*, February 26, 2013. This paper can be located at http://www.westgov.org/PUCeim/meetings/2013sprg/briefing/03-08-13FERC-EIMrbqa.pdf or http://www.caiso.com/Documents/QualitativeAssessment-PotentialReliabilityBenefits-WesternEnergyImbalanceMarket.pdf .

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

- identifying transmission availability and obtain E-tag approvals;
- diversifying variable energy resource output across footprint;
- providing access to wider variety of balancing options including more ramping capability;
- allowing individual balancing authorities to hold fewer resources in reserve.[27]

While the FERC study did not attempt to quantify these benefits, real economic consequences are associated with each, and in some cases are quite significant, as illustrated by SPPs comments described in the next section. The Environmental and Clean Energy Stakeholders recommend including these reliability benefits in any evaluation of the benefits and costs of an EIM in Nevada.

SPP Experience

In April of 2013, SPP issued a paper describing its experience providing an Energy Imbalance Services ("EIS") market.[28] With regards to benefits, SPP reports that SPP members benefited "far in excess" of anticipated savings as well as the costs.[29]

With regards to reliability, SPP states: "SPP has experienced both a faster response to reliability, for thermal, stability, and voltage limits or issues, as well as SPP members experiencing a better economic solution to those limits or issues…Allowing the EIS market to resolve the issues has provided better and faster solutions….while also making relief obligations more equitable."[30]

SPP says the following with regards to variable generation: "Balancing Authorities have reported reduced reserve requirements for ramping…One Balancing Authority was able to integrate up to 40% of their energy from renewables and stated that without the EIS market they never could have met their CPS requirements. Note that the rest of the EIS Market was able to benefit from times of both over production or under production of the wind from that particular party."[31]

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[27] Mason Emnett, Deputy Director of the Office of Energy Policy and Innovation, Federal Energy Regulatory Commission, *Qualitative Assessment of Potential Reliability Benefits from a Western Energy Imbalance Market*, Presentation to Energy Imbalance Market Meeting, Boise Idaho, April 8, 2013.

[28] Southwest Power Pool, *Experiences of an EIS Market*, April 1, 2013.

[29] Ibid., p. 5.

[30] Ibid., p. 4.

[31] Ibid., p. 5.

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

With regards to transmission, SPP reports that one of the first benefits experienced is the more efficient use of transmission capacity, and, because of faster relief provided by the EIS dispatch, Reliability Coordinators are able to allow higher line loadings. Significantly, fears that transmission revenue by individual transmission owners would be lost were not realized. Instead, point-to-point service has increased. [32]

2. Regulatory Treatment of Costs and Benefits of Participation in an EIM

The Environmental and Clean Energy Stakeholders support the regulatory principle that the beneficiary pays. Since customers are expected to benefit from their utilities' participation in an EIM through lower net power costs, customers should pay the associated capital costs. This is particularly true with the low-cost, low-risk approach offered by the CAISO which is pricing the one-time entrance fee at 3 cents multiplied by the participants' sales volume, and charging operational services at 19 cents per MWh of imbalance service. If benefits don't flow as expected, the CAISO is charging no exit fee.

Within the western interconnection, PacifiCorp will be the first utility to address the regulatory treatment of costs and benefits. On July 17, 2013, PacifiCorp reported to its regulators that it intends to seek cost recovery for startup capital costs in an upcoming rate case. PacifiCorp is expected to justify the prudence of these expenditures in its filing.

3. Transmission Expansion and an EIM

In its June 28 procedural order, the Commission requests that parties identify documents that assess the impact of transmission expansion/reservation between balancing areas specifically for increasing the benefits of an EIM. The March 13, 2013 study, *PacifiCorp-ISO Energy Imbalance Market Benefits,* includes this type of analysis.[33] It assesses the impact of three levels of transfer capability between PacifiCorp and the CAISO: 100 MW, 400 MW and 800 MW. In the study, increasing transfer capacity between PacifiCorp and the CAISO from 100 MW to 400 MW significantly increases the market benefit. The marginal benefit of additional transfer capacity beyond

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[32] Ibid., p. 6.

[33] *PacifiCorp-ISO Energy Imbalance Market Benefits*, March 13, 2013. http://www.caiso.com/Documents/PacifiCorp-ISOEnergyImbalanceMarketBenefits.pdf.

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

400 MW is less significant.[34] We wish to emphasize that this result is specific to the CAISO-PacifiCorp situation. It is not indicative of either the transfer capability between CAISO and NV Energy or the potential benefits at any specific transfer capacity levels.

4. Conclusion and Recommendation

The confluence of the impending completion of ON Line, the announced acquisition of NV Energy by MidAmerican (owner of PacifiCorp), and the development of the CAISO/PacifiCorp EIM provides a unique opportunity for NV Energy to play a significant role in the development of an interconnection-wide EIM. NV Energy's Balancing Authority areas lie at the heart of the interconnection, and both Balancing Authorities are electrically tied to the CAISO and are soon to be connected to one another with completion of ON Line.[35] Participation by NV Energy in the CAISO/PacifiCorp EIM would create a large contiguous footprint covering much of the western interconnection. Because of the importance of NV Energy to the southwest and PacifiCorp to the northwest, cooperation between CAISO, PacifiCorp, and NV Energy has the potential to bridge regional interests and provide an impetus for creating an interconnection-wide EIM.[36]

In its June 28 procedural order, the Commission directed NV Energy to provide a summary of its efforts "to assess participation in an EIM including a summary of its studies with the CAISO."[37] We look forward with anticipation to learning of NV Energy's assessment efforts and hope to learn that formal studies are well underway with preliminary results available for review.

However, given the potential significant annual benefits to Nevada customers from participation in an EIM that would be foregone if NV Energy bypassed this opportunity, and given the significance of NV Energy's pivotal role in the western interconnection and in the southwest in particular, if NV Energy has not already initiated a formal cost-benefit study of participation in the CAISO/PacifiCorp EIM, Environmental and Clean Energy Stakeholders recommend the Commission direct NV Energy to commence this evaluation and specify a deadline to file the report with the

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[34] Ibid., p. 32.

[35] Nevada Power is connected to PacifiCorp's eastern balancing area, and the CAISO is connected to PacifiCorp's western balancing area.

[36] Benefits and EIM size are strongly correlated, the greater the participation, the greater the benefits.

[37] Procedural Order, Docket No11-04025, June 28, 2013, p. 2.

Commission. This effort should be undertaken as soon as possible so that NV Energy could participate in the EIM when it goes live in October of 2014.

Western Resource Advocates, Clean Energy Project, Interwest Energy Alliance, Natural Resources Defense Council, Sonoran Institute, Nevada Chapter of the American Institute of Architects, and Vote Solar respectfully submit these comments on August 9, 2013.

Nancy Kelly, Senior Policy Advisor
Western Resource Advocates
204 N. Minnesota Street, Suite 1-A
Carson City, NV 89703-4151
(775) 841-2400
Fax (866) 223-8365
nancy.kelly@westernresources.org

ROBERT G. JOHNSTON, ESQ.
Nevada Bar No. 02256
KILPATRICK, JOHNSTON & ADLER
412 No. Division Street
Carson City, NV 89703
(775) 882-6112 / (775) 882-6114 (Fax)
rjohnston.kja@pyramid.net

Attorneys for Western Resource Advocates

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A , Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org

CERTIFICATE OF MAILING

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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, facsimile, or mailing a true copy thereof, properly addressed with postage prepaid or forwarded as indicated below to:

Tammy Cordova	PUCN, Regulatory Operations Staff	tcordova@puc.nv.gov
PUCN	Regulatory Operations Staff	pucn.sc@puc.nv.gov
Christopher Hilen	NV Energy, Inc.	chilen@nvenergy.com
Trevor Dillard	Regulatory Operations NV Energy, Inc.	regulatory@nvenergy.com
Connie Silveira	NV Energy, Inc.	csilveira@nvenergy.com
Patti Pastrell	NV Energy, Inc.	ppastrell@nvenergy.com
Janice Baldarelli	NV Energy, Inc.	jbaldarelli@nvenergy.com
NV Attorney General	Bureau of Consumer Protection	bcpserv@ag.nv.gov
Carl Linvill	RAP Energy Solutions	clinvill@raponline.org
Eric Leuze	Genon Energy Inc.	eric.leuze@genon.com
Sean Beatty	Genon Energy Inc.	sean.beatty@genon.com
Geraldine Kim	XCEL Energy Services Inc.	geraldine.kim@xcelenergy.com
William Dudley	Exel Energy Services Inc.	bill.dudley@xcelenergy.com
Jim Baak	The Vote Solar Initiative	jbaak@votesolar.org
John Stout	Mariner Consulting Services	jstout@marinerconsult.com
Caitlin Liotiris	Energy Strategies LLC	ccollins@energystrat.com
Michelle Mizumori	Western Electricity Coordinating	mmizurmori@wecc.biz

Rachel McMahon	First Solar	rachel.mcmahon@firstsolar.com
Rebecca Johnson	CO Public Utilities Commission	rebecca.johnson@dora.state.co.us

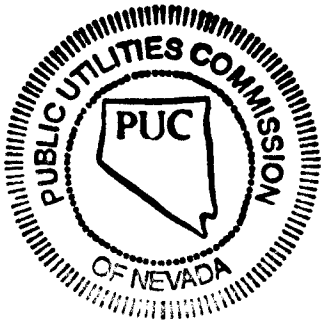
DATED August 9, 2013

Completed By:

Regina M. Nichols

Regina M. Nichols

WESTERN RESOURCE ADVOCATES
204 N. Minnesota St. Ste 2-A, Carson City, NV 89706
(775) 841-2400 Fax: (866) 223-8365 – regina.nichols@westernresources.org



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