

Sierra Pacific Power Company and Nevada Power Company
d/b/a NV Energy
6100 Neil Rd., P.O. Box 10100
Reno, Nevada 89520-0024

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BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

IN THE MATTER OF:)
Application of NEVADA POWER COMPANY and)
SIERRA PACIFIC POWER COMPANY d/b/a NV)
ENERGY Under the Utility Environmental Protection)
Act for a Permit to Construct Transmission Facilities)
As Part of the Renewable Transmission Initiative)

Docket No. 11-05 _____

**INITIAL APPLICATION OF NEVADA POWER COMPANY AND SIERRA PACIFIC
POWER COMPANY D/B/A NV ENERGY UNDER THE UTILITY
ENVIRONMENTAL PROTECTION ACT FOR A PERMIT TO CONSTRUCT
TRANSMISSION FACILITIES AS PART OF THE RENEWABLE TRANSMISSION
INITIATIVE**

A. INTRODUCTION

Applicants Nevada Power Company d/b/a NV Energy (“Nevada Power”) and Sierra Pacific Power Company d/b/a NV Energy (“Sierra Pacific”), through undersigned counsel, and in accordance with Subsection 2 of Nevada Revised Statutes (“NRS”) 704.870 and Nevada Administrative Code (“NAC”) 703.423, hereby files with the Public Utilities Commission of Nevada (“Commission”) an Initial Application for a Permit to Construct the facilities described below (the “Proposed Utility Facilities”), namely overhead electric transmission facilities required to access renewable energy zones, pursuant to the Utility Environmental Protection Act (“UEPA”) set forth in NRS 704.820 to 704.900 (the “Initial UEPA Application”).

This Initial UEPA Application is filed with the Commission pursuant to NRS 704.870(2)(A) for a permit to construct a utility facility where a federal agency is required to conduct an environmental analysis of the proposed utility facility.

Nevada Power and Sierra Pacific propose to construct, operate and maintain a system of new overhead 230 kV, 345 kV and/or 500 kV electric transmission lines and associated facilities (the “Proposed Utility Facilities”) that will be developed as part of their Renewable Transmission Initiative.

1 The Proposed Utility Facilities would be constructed, operated, and maintained by NV
2 Energy to provide transmission service to renewable energy projects in selected renewable
3 energy zones originally identified by Nevada’s Renewable Energy Transmission Access
4 Advisory Committee (“RETAAC”) as promising areas for the development of renewable
5 energy generation. As part of the Renewable Transmission Initiative, NV Energy will conduct
6 an open transmission planning process to determine which of the renewable energy zones
7 previously identified by the State of Nevada enjoy sufficient commitment on the part of the
8 market participants to support the construction of the transmission infrastructure that is
9 required to deliver energy from those zones to electric markets in Nevada, California and other
10 parts of the Southwestern United States. The Proposed Utility Facilities would provide the
11 transmission infrastructure and capacity necessary to reliably and cost effectively deliver
12 renewable energy to markets from the renewable energy zones identified in the Renewable
13 Transmission Initiative.

14 Because the precise scope of the transmission facilities that will ultimately be
15 constructed as part of the Renewable Transmission Initiative will not be determined until the
16 conclusion of the open transmission planning process, Nevada Power and Sierra Pacific are
17 including in this Initial UEPA Application the transmission facilities that would be required for
18 all of the renewable energy zones that are part of the Renewable Transmission Initiative.
19 Nevada Power and Sierra Pacific are filing this Initial UEPA Application at this time because
20 they are concurrently filing with the U. S. Bureau of Land Management (“BLM”) an
21 application for approval to construct and operate the Proposed Utility Facilities. NRS
22 704.870(2)(a) requires the filing of this Initial UEPA Application at this time due to the filing
23 of the application with BLM.

24 Nevada Power and Sierra Pacific request that the Commission accept this Initial
25 Application under UEPA as complying with the statutory and regulatory requirements set forth
26 above. Nevada Power and Sierra Pacific will submit an amended application under UEPA
27 after the U.S. Bureau of Land Management (“BLM”) completes its environmental analysis of
28

1 the Proposed Utility Facilities. At that time, Nevada Power and Sierra Pacific will request
2 Commission approval of their request for a Permit to Construct the Proposed Utility Facilities
3 pursuant to NRS 704.8905.

4 **B. GENERAL ALLEGATIONS**

5 1. Nevada Power and Sierra Pacific are wholly-owned subsidiaries of NV Energy,
6 Inc., a holding company incorporated under the laws of the State of Nevada.

7 2. Nevada Power provides retail electric service to the public in portions of Clark
8 and Nye Counties. Sierra Pacific provides retail electric service to the public in northern
9 Nevada. Each company is a “public utility” as that term is defined and used in NRS 704.741 to
10 .751 (Resource Planning).

11 3. Nevada Power’s principal place of business, mailing address and telephone
12 number are: 6226 West Sahara Avenue; P.O. Box 98910, Las Vegas, Nevada 89151; (702)
13 367-5000.

14 4. Sierra Pacific’s principal place of business, mailing address and telephone
15 number are: 6100 Neil Road; P.O. Box 10100, Reno, Nevada, 89520; (775) 834-3600

16 5. All correspondence related to this Application (copy of all pleadings, notices,
17 orders and discovery requests) should be sent to the undersigned counsel and to the Manager of
18 Regulatory Services, whose names and addresses are set forth below:

19

20 Christopher A. Hilten Associate General Counsel NV Energy 6100 Neil Road Reno, NV 89511 Tel: (775) 834-5696 Fax: (775) 834-4811 E-Mail: chilten@nvenergy.com	21 Trevor Dillard Manager Regulatory Services NV Energy 6100 Neil Road Reno, NV 89511 Tel: (775) 834-5823 Fax: (775) 834-4484 E-Mail: regulatory@nvenergy.com
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25 **C. LEGAL AUTHORITY**

26 6. UEPA establishes a two-step application procedure for projects subject to
27 federal permitting and environmental review. Under NRS 704.870.2(a), if a federal agency is
28 required to conduct an environmental analysis of a proposed utility facility, the entity seeking a

1 UEPA permit is required to also file an initial application with the Commission that provides
2 notice of the federal filing. Subsequently, after the issuance of the federal environmental
3 assessment or environmental impact statement, the utility is required to file with the
4 Commission an amended application (NRS 704.870.2(b)).

5 7. Nevada Power and Sierra Pacific are required NRS 704.870.2 to file this Initial
6 UEPA Application because they are concurrently filing an application with the BLM
7 requesting approval of the construction of the utility facilities that are the subject of this Initial
8 Application.

9 8. This Application for a Permit to Construct the Proposed Utility Facilities is filed
10 in accordance with the Commission's regulations governing pleadings (NAC 703.530 et seq.);
11 the UEPA (NRS 704.820 to .900), specifically: NRS 704.870.2 (requirements for filing after a
12 federal agency has completed its environmental review of the project); NRS 704.873
13 (Commission has exclusive jurisdiction to determine need for utility facilities); NRS 704.890
14 (Grant or denial of application: Required findings; conditions and modifications); and the
15 Commission's regulations governing construction of utility facilities (NAC 703.415 to .427,
16 specifically, NAC 703.423, requirements for filing after a federal agency has completed its
17 environmental review of the project).

18 **D. ALLEGATIONS OF MATERIAL FACTS**

19 9. New transmission lines and associated facilities will be required to provide the
20 transmission infrastructure and capacity necessary to reliably and cost effectively deliver
21 Nevada renewable energy from renewable energy zones located in northern and west-central
22 Nevada to markets in Nevada, California, and other areas of the southwestern United States.

23 10. In the Renewable Transmission Initiative, Nevada Power and Sierra Pacific
24 will conduct an open transmission planning process that will include a request for eligible
25 parties to request transmission capacity rights from four renewable energy zones previously
26 identified by Nevada's RETAAC as areas with high renewable energy potential and existing
27 transmission constraints. The renewable energy zones identified by RETAAC have been
28 incorporated into Nevada Administrative Code ("NAC") 704.880.

1 11. The Proposed Utility Facilities would be located primarily on land administered
2 by the U.S. Bureau of Land Management. If all segments of the RTI are developed, it would
3 consist of approximately 537 miles of new overhead 345 kV and/or 500 kV transmission lines
4 and associated facilities as follows:

5 a. Approximately 39 miles of new overhead 345 kV transmission line would be
6 constructed from the Dixie Valley in southeastern Pershing County, Nevada to
7 the existing Oreana Substation also located in Pershing County. From the
8 Oreana Substation, the transmission line would interconnect with existing 345
9 kV Sierra Pacific overhead transmission lines and follow this existing route
10 southwest for approximately 52 miles to the existing East Tracy Substation in
11 Washoe County, Nevada.

12 b. Approximately 498 miles of new overhead 230 kV, 345 kV and/or 500 kV
13 transmission line would be constructed from the existing Fort Sage Substation
14 in Washoe County to the existing Eldorado Substation in Clark County. This
15 component of the Proposed Utility Facilities would include the following
16 segments: (1) approximately 49 miles from the Fort Sage Substation to the
17 existing East Tracy Substation located in Storey County; (2) approximately 42
18 miles from the East Tracy Substation to the Fort Churchill Generation Facility
19 in Lyon County; (3) approximately 356 miles from the Fort Churchill
20 Substation through Esmeralda, Mineral, Nye Counties to the existing Harry
21 Allen Substation in Clark County; and (4) approximately 51 miles from the
22 Harry Allen Substation south to the existing Eldorado Substation in southern
23 Clark County.

24 12. The response to the open transmission planning process portion of the RTI will
25 indicate the level of market interest in development of specific identified renewable energy
26 zones, the level of market interest in Nevada renewable exports, and the level of financial
27 commitment market participants are willing to make to create a renewable energy export
28

1 pipeline. The response will determine which of the facilities that are described in this Initial
2 UEPA Application will be constructed.

3 13. The Proposed Utility Facilities are more fully described in Part 2 of the UEPA
4 Application (attached) and its exhibits. Part 2 of the UEPA Application: (a) describes the
5 location and the nature of the Proposed Utility Facilities; (b) summarizes studies made of the
6 environmental impact of the construction of the Proposed Utility Facilities; (c) describes the
7 environmental effects of the construction and operation of the Proposed Utility Facilities, and
8 (e) describes the measures that will be implemented to mitigate those temporary impacts, as
9 required by NRS 704.870.2(b) and NAC 703.423.

10 14. Together with the detailed project description (see the attached UEPA
11 Application Part 2) and Exhibits **A** (Project Vicinity Location Map), **B** (Proposed Renewable
12 Energy Zones, **C** (Public Notice and Affidavits of Publication, and **D** (Certificate of Service),
13 which are incorporated herein by reference, this Application contains all of the information
14 required for the Commission to evaluate and grant the Application.

15 15. Nevada Power and Sierra Pacific will provide additional permits, licenses and
16 approvals granted by other government agencies that are required to construct the Proposed
17 Utility Facilities to the Commission as they are received.

18 16. Regarding Public Notice, proof of publication of a summary of this UEPA
19 Application has appeared in newspapers published and distributed in the area where the
20 Proposed Utility Facilities are planned pursuant to NRS 704.870.4(b) and NAC 703.423(5)
21 (*see Exhibit C*).

22 17. Regarding proof of service, a copy of this UEPA Application has been filed on
23 the clerk of each local government affected by the location pursuant to NRS 704.870.4(a) (*see*
24 *Exhibit D*).

25 18. The State Environmental Commission is designated as a party to this
26 proceeding, pursuant to NRS 704.885(1)(b), and has been served a copy of this Application
27 pursuant to NRS 704.870(3), simultaneously with this filing (*see Exhibit D*).
28

E. RELATED COMMISSION FILINGS

1
2 19. The proposed transmission facilities that are the subject of this Initial
3 Application have not yet been approved by the Commission in an Integrated Resource Plan
4 (“IRP”) filing.

5 20. Concurrently with the filing of this Initial UEPA Application, Nevada Power
6 and Sierra Pacific will shortly file a petition with the Commission requesting that it issue an
7 order finding, pursuant to NAC 704.0097, that good cause exists to permit the Utilities to
8 deviate from NAC 704.9503(1) and delay filing amendments to their IRP Action Plans even
9 though the Utilities are filing an Initial Application for a UEPA Permit to Construct, which
10 filing would otherwise trigger an obligation under NAC 704.9503(1) to file amendments to
11 their Action Plans.

12 21. Nevada Power and Sierra Pacific will request this deviation from NAC
13 704.9503(1) because the scope of the transmission facilities that will ultimately be constructed
14 as part of the Renewable Transmission Initiative will not be determined until the conclusion of
15 the open transmission planning process. As a result, the Utilities do not at this point in time
16 know which of the potential transmission facilities that are included in the Renewable
17 Transmission Initiative will need to receive resource planning authorization. While the
18 Utilities are required by statute to file this Initial UEPA Application at this time, they will
19 request resource planning authorization in the future to construct only those transmission
20 facilities for which market support is expressed for their construction in the open transmission
21 planning process.

F. PRAYER FOR RELIEF

22
23 Nevada Power and Sierra Pacific respectfully request that the Commission proceed in
24 the manner required by law and, in accordance with NAC 703.535(d):

25 A. Accept this initial UEPA Application as complying with NRS 704.870(2)(a),
26 pursuant to which an amended UEPA application requesting approval for a
27 permit to construct will be filed in accordance with NRS 704.870(2)(b) after the
28 final federal agency review process is complete;

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- B. Grant such deviations from the Commission’s regulations as may be in the public interest; and
- C. Grant Nevada Power and Sierra Pacific such other and further relief as the Commission may find reasonable and appropriate under the circumstances.

RESPECTFULLY SUBMITTED this 6th day of May, 2011.

**NEVADA POWER COMPANY AND
SIERRA PACIFIC POWER COMPANY
D/B/A NV ENERGY**

By: /s/Christopher A. Hilén/s/
Christopher A. Hilén
Associate General Counsel
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Draft Notice Application for Applications, Petitions and Complaints

Page 1 of 2

The Commission requires a draft notice be included with all applications, petitions and complaints. See Nevada Administrative Code 703.162. Please include one copy of this form with all the above filings.

- I. Include a title that describes the relief requested, or proceeding scheduled pursuant to Nevada Administrative Code (“NAC”) 703.160(4)(a.)

Initial Application of Nevada Power Company and Sierra Pacific Power Company d/b/a NV Energy Under the Utility Environmental Protection Act for a Permit to Construct Transmission Facilities as Part of the Renewable Transmission Initiative

- II. Include the name of the applicant, complainant, petitioner, or the name of the agent for same pursuant to NAC 703.160(4)(b).

Nevada Power Company and Sierra Pacific Power Company d/b/a NV Energy

- III. Include a paragraph with a brief description of the purpose of the filing or proceeding with an introductory statement in plain English understandable to a person of average knowledge and intelligence, that summarizes the relief requested or proceeding scheduled, **AND** its impact upon consumers, pursuant to NAC 704.160(4)(c).

This is Nevada Power and Sierra Pacific Power Company's initial application for approval of a permit to construct overhead electric transmission facilities required to access renewable energy zones as part of their Renewable Transmission Initiative pursuant to the Utility Environmental Protection Act set forth in NRS 704.820 to .704.900 and in NAC 703.423.

Under the UEPA, if a federal agency is required to conduct an environmental analysis of a proposed facility, the utility is required to file with the Public Utilities Commission of Nevada (“Commission”) notice of the federal filing. The initial UEPA application must provide a general description of the proposed facility and a summary of the studies that the utility anticipates will be made of the environmental impact of the proposed facility. Subsequently, within 30 days after issuance of the federal environmental assessment or impact statement (prepared by the U.S. Bureau of Land Management), the utility files with the Commission an amended UEPA application. This is the initial UEPA application for this project.

The Proposed Utility Facilities would be constructed, operated, and maintained by Nevada Power and Sierra Pacific to provide transmission service to

renewable energy projects in selected renewable energy zones originally identified by Nevada's Renewable Energy Transmission Access Advisory Council ("RETAAC") as promising areas for the development of renewable energy generation. As part of the Renewable Transmission Initiative, Nevada Power and Sierra Pacific will conduct an open transmission planning process to determine which of the renewable energy zones previously identified by the State of Nevada enjoy sufficient commitment on the part of market participants to support the construction of the transmission infrastructure that is required to deliver energy from those renewable energy zones to electric markets in Nevada, California and other parts of the Southwestern United States. The Proposed Utility Facilities would provide the transmission infrastructure and capacity necessary to reliably and cost effectively deliver renewable energy to markets from the renewable energy zones identified in the open transmission planning process. A general description of the Proposed Utility Facilities is provided below:

- Approximately 39 miles of new overhead 345 kV transmission line would be constructed from the Dixie Valley in southeastern Pershing County, Nevada to the existing Oreana Substation also located in Pershing County. From the Oreana Substation, the transmission line would interconnect with existing 345 kV Sierra Pacific overhead transmission lines and follow this existing route southwest for approximately 52 miles to the existing East Tracy Substation in Washoe County, Nevada.
- Approximately 498 miles of new overhead 230 kV, 345 kV and/or 500 kV transmission line from the existing Fort Sage Substation in Washoe County to the existing Eldorado Substation in Clark County. This component of the Proposed Utility Facilities would include the following segments: (1) approximately 49 miles from the Fort Sage Substation to the existing East Tracy Substation located in Storey County; (2) approximately 42 miles from the East Tracy Substation to the Fort Churchill Generation Facility in Lyon County; (3) approximately 356 miles from the Fort Churchill Substation through Esmeralda, Mineral, Nye Counties to the existing Harry Allen Substation in Clark County; and (4) approximately 51 miles from the Harry Allen Substation south to the existing Eldorado Substation in southern Clark County.

AND Pursuant to NAC 703.160(5)(c), the effect of the relief upon consumers:

If granted, Commission issuance of the UEPA permit to construct will indicate that Nevada Power and Sierra Pacific may recover, in a future application for a change in its electric rates, all costs prudently and reasonably incurred in carrying out the UEPA permit to construct the proposed power generating facility.

- IV. A declaration by the applicant, petitioner, or complainant whether a consumer session is required by Nevada Revised Statute ("NRS") 704.069 (1).¹

¹ NRS 704.069 Commission required to conduct consumer session for certain rate cases; Commission required to conduct general consumer session annually in certain counties.

A consumer session is not required for this Application.

- V. If the draft notice pertains to a tariff filing, please include the tariff number **and** the section number(s) or schedule number(s) being revised.

Not applicable.

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110, inclusive, in which:

(a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and

(b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant's annual gross operating revenue, whichever is less.

2. In addition to the case-specific consumer sessions required by subsection 1, the Commission shall, during each calendar year, conduct at least one general consumer session in the county with the largest population in this state and at least one general consumer session in the county with the second largest population in this state. At each general consumer session, the Commission shall solicit comments from the public on issues concerning public utilities. Not later than 60 days after each general consumer session, the Commission shall submit the record from the general consumer session to the Legislative Commission.

**NEVADA POWER COMPANY AND
SIERRA PACIFIC POWER COMPANY**
doing business as NV Energy

**INITIAL APPLICATION UNDER THE UTILITY
ENVIRONMENTAL PROTECTION ACT FOR A PERMIT
TO CONSTRUCT TRANSMISSION FACILITIES AS
PART OF THE RENEWABLE TRANSMISSION
INITIATIVE**
(Part 2)

Docket No. 11-05_____

David N. Hicks
Director of New Business Development and Special Projects

**NEVADA POWER COMPANY AND
SIERRA PACIFIC POWER COMPANY**

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Las Vegas, NV 89146
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NEVADA POWER COMPANY AND
SIERRA PACIFIC POWER COMPANY
d/b/a NV Energy

INITIAL APPLICATION FOR PERMIT TO CONSTRUCT A UTILITY FACILITY
Pursuant to the Utility Environmental Protection Act (“UEPA”)
NRS 704.870 to .900 and NAC 703.415 to .427

Nevada Power Company and Sierra Pacific Power Company, both d/b/a NV Energy (respectively, “Nevada Power” and “Sierra Pacific” and jointly “NV Energy”), file this initial application with the Public Utilities Commission of Nevada (“Commission”) pursuant to paragraph (a) of subsection 2 of NRS 704.870 for a permit to construct a utility facility where a federal agency is required to conduct an environmental analysis of the proposed utility facility.

1. A general description of the location of the proposed utility facility, as required by NAC 703.421(1):

Nevada Power and Sierra Pacific propose to construct, operate and maintain a system of new overhead 230 kV, 345 kV and/or 500 kV electric transmission lines and associated facilities. Nevada Power’s and Sierra Pacific’s Renewable Transmission Initiative Project (the “RTI” or “Proposed Utility Facilities”) would consist of approximately 537 miles of new overhead electric transmission lines and associated facilities. The new transmission lines and associated facilities will be required to provide the transmission infrastructure and capacity necessary to reliably and cost effectively deliver renewable energy from renewable energy zones located in northern and west-central Nevada to markets in Nevada, California, and other areas of the southwestern United States.

The Proposed Utility Facilities would be constructed, operated, and maintained by Nevada Power and Sierra Pacific to provide transmission service to renewable energy projects in selected renewable energy zones originally identified by Nevada’s Renewable Energy Transmission Access Advisory Council (“RETAAC”) as promising areas for the development of renewable energy generation. As part of the Renewable Transmission Initiative, Nevada Power and Sierra Pacific will conduct an open transmission planning process to determine which of the renewable energy zones previously identified by the State of Nevada enjoy sufficient commitment on the part of market participants to support the construction of the transmission infrastructure that is required to deliver energy from those renewable energy zones to electric markets in Nevada, California and other parts of the Southwestern United States. The Proposed Utility Facilities would provide the transmission infrastructure and capacity necessary to reliably and cost effectively deliver renewable energy to markets from the renewable energy zones identified in the open transmission planning process.

The Proposed Utility Facilities would include, where feasible, the use of existing transmission lines and planned transmission projects within existing rights-of-way. The proposed action, which is depicted in Exhibit A, would serve the REZs identified in Exhibit B. A general description of the Proposed Utility Facilities is provided below:

- Approximately 39 miles of new overhead 345 kV transmission line would be

constructed from the Dixie Valley in southeastern Pershing County, Nevada to the existing Oreana Substation also located in Pershing County. From the Oreana Substation, the transmission line would interconnect with existing 345 kV Sierra Pacific overhead transmission lines and follow this existing route southwest for approximately 52 miles to the existing East Tracy Substation in Washoe County, Nevada.

- Approximately 498 miles of new overhead 230 kV, 345 kV and/or 500 kV transmission line from the existing Fort Sage Substation in Washoe County to the existing Eldorado Substation in Clark County. This component of the Proposed Utility Facilities would include the following segments: (1) approximately 49 miles from the Fort Sage Substation to the existing East Tracy Substation located in Storey County; (2) approximately 42 miles from the East Tracy Substation to the Fort Churchill Generation Facility in Lyon County; (3) approximately 356 miles from the Fort Churchill Substation through Esmeralda, Mineral, Nye Counties to the existing Harry Allen Substation in Clark County; and (4) approximately 51 miles from the Harry Allen Substation south to the existing Eldorado Substation in southern Clark County.

The Renewable Transmission Initiative will include future renewable resource project planning near approximately 75 miles of existing right-of-way currently held by Nevada Power for a 500 kV transmission line route from the existing Harry Allen Substation in Clark County to the Delamar Valley in Lincoln County. This right-of-way follows the Southwest Intertie Project (SWIP) Utility Corridor and generally parallels the One Nevada Transmission Line (ON-Line) Project being developed jointly by NV Energy and Great Basin Transmission South, LLC.

Currently, Nevada Power and Sierra Pacific plan to primarily utilize existing substations to interconnect the proposed transmission lines. Existing substations, which are depicted in Figure 1-1, include: Oreana, Fort Sage, East Tracy, Northwest, Harry Allen, and Eldorado. With the exception of the Eldorado Substation, all of these substations are currently owned and operated by Nevada Power or Sierra Pacific. The Eldorado Substation is jointly owned by Nevada Power with Southern California Edison (SCE), the Los Angeles Department of Water and Power (LADWP), and the Salt River Project (SRP). The Proposed Utility Facilities may also require upgrades to the existing substations and planning and construction of new substation locations. These upgrades and new substations would be identified through the RTI and in accordance with the FERC OATT as generation project developers submit interconnection-requests.

Exhibit A provides an overview of the Proposed Utility Facilities routes and the locations of existing substations. The Proposed Utility Facilities are located within the following Nevada Counties: Churchill, Clark, Douglas, Esmeralda, Lyon, Mineral, Nye, Pershing, Storey, and Washoe.

(a) A regional map identifying the location of the proposed utility facility:

See Exhibit A Project Vicinity/Location Map.

(b) Alternative locations for the proposed utility facility:

The project crosses federally-managed lands. An alternatives analysis will be completed for the National Environmental Policy Act (“NEPA”) document that the BLM will draft.

(c) The reason why the location identified in paragraph (a) is best suited for the proposed utility facility:

The precise locations of the proposed transmission facilities will be determined by the BLM and cooperating agencies through the NEPA process.

2. A general description of the proposed utility facility, as required by NRS 704.870.2(a)(1) and NAC 703.421(2):

The Proposed Utility Facilities would include new construction of 230 kV, 345 kV and/or 500 kV transmission lines and associated facilities, which would allow delivery of Nevada renewable energy resources to markets. Nevada Power and Sierra Pacific are proposing to build approximately 537 miles of new overhead transmission line and associated facilities with portions of the Proposed Utility Facilities located within established federal and state transmission corridors.

The design, construction, operation, and maintenance of the transmission systems would meet or exceed the requirements of the National Electrical Safety Code, U.S. Department of Labor, Occupational Safety and Health Standards, and NV Energy requirements for safety and protection of landowners and their property. Typical electrical characteristics that may be used for the proposed action are summarized in Table 1 below.

**Table 1
Typical Electrical Characteristics of the Transmission Line**

Feature	Description
Line Length (new)	Approximately 537 miles of new construction
Type of Structures	Galvanized, Painted, or Self-weathering Steel Lattice Guyed –V Lattice Self Supporting Tubular H-frame Tubular Three-Pole Steel Tubular Quad Structures
Structure Height	Single-circuit structures 100-185 feet and Double-circuit structures 150-190 feet
Span Length	Average span 900-1,600 feet
Number of Structures per mile	4 to 6
Typical right-of-way	260-400 feet
Electrical Properties	
Nominal Voltage	525,000 volts Alternating Current
Capacity (500 kV)	2,000 Megawatts (MW)
Circuit Configuration	Single-circuit with three phases; three conductors per phase

Conductor Size	1590 kcmil Aluminum Conductor Steel Reinforced (ACSR), 1.5" diameter per conductor
Shield Wire Size	7/16" diameter steel or approximately 0.9" diameter fiber optic cable
Ground Clearance of Conductor	Designed to exceed the code minimum requirement at the maximum operating temperature, lowest requirement is 25.8'

(a) Size and nature of the proposed utility facility:

See Table 1 above.

(b) Natural resources used during the construction and operation of the proposed utility facility:

During construction of the Proposed Utility Facilities, water will be utilized to minimize the impacts to air quality and to stabilize the soil. Wood and various metals will be used during the construction of the facilities and supporting structures. Impacts to resources will be determined through the NEPA process.

3. A summary of the studies Nevada Power and Sierra Pacific anticipate will be made of the environmental impact of the Proposed Project, including a copy of all corresponding studies filed with appropriate federal agencies, as required by NRS 704.870(2) and NAC 703.421(3):

Natural resource studies will be conducted to determine the baseline and impacts to resources within the area of the Proposed Utility Facilities. Natural resources anticipated to be studied on the Proposed Utility Facilities include, but may not be limited to, biological, air quality, soils, cultural, and water resources. Existing resource studies and conclusions will be utilized, where applicable and appropriate, for the environmental analysis.

The BLM will conduct an environmental analysis, which will include utilizing any existing studies/reports, to evaluate the potential for significant impacts on the human environment and recommend mitigation measures to reduce potential impacts to a less-than-significant level. A summary of the results of these studies, and copies of documents, will be included in the submittal to the Commission of the Amended UEPA Application.

4. Copy of the public notice of the application and proof of the publication of the public notice, as required by subsection 4 of NRS 704.870 and NAC 703.421(4):

See Exhibit C for a copy of the public notice and affidavits of publication.

5. Proof that a copy of the application has been submitted to the Nevada State Clearinghouse within the Department of Administration to enable agency review and comment, as required by NAC 703.421(5):

A copy of this Initial Application is being served on the Nevada State Clearinghouse. The Certificate of Service (Exhibit D) lists the Clearinghouse.

Table 2 below includes the approvals anticipated to be necessary for the Proposed Utility Facilities. Copies of the permits will be provided either with the Amended UEPA Application Nevada Power and Sierra Pacific will file with the Commission after completion of the NEPA analysis and an agency preferred route is determined or thereafter as the permits are obtained.

**Table 2
Federal, State and County Permits Needed for Construction**

Issue	Regulatory Agency or Authority	Permit, License, Compliance, or Review
NEPA Compliance	BLM; cooperating agencies	EIS and Record of Decision
ROW Across Land Under Federal Management	BLM and affected land-managing agencies, including Bureau of Reclamation (“BOR”) and Department of Defense (“DOD”)	ROW grant and temporary use permit for utility systems and facilities
	Bureau of Indian Affairs (“BIA”), affected tribes	ROW grant across American Indian trust lands; Temporary use permits for construction-related activities
	National Park Service	Review of transmission line corridor to identify conflicts with recreational area
	Fish and Wildlife Service	Special use permit for crossing a national wildlife refuge
	U.S. Department of Defense	Temporary use permit for construction-related activities; Consultations on effects to military airspace
	Federal Highway Administration	Permits to cross Federal Aid Highway; 4 (f) compliance
Biological Resources	FWS; cooperating agencies	Endangered Species Act Section 7 consultation/compliance by Federal land-managing agencies and lead agency
		Compliance
		Compliance
Ground Disturbance and Air and Water Quality Degradation	Environmental Protection Agency (EPA)	Section 402 National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Construction Activities, various air quality permits needed for ground disturbing activities
	USACE	General easement, Floodplain use permits, Nationwide Permit 12
	BLM	Compliance
	USACE; EPA on tribal lands	404 Permit (individual or nationwide)

Issue	Regulatory Agency or Authority	Permit, License, Compliance, or Review
	Affected land-managing agencies	Review by permitting agencies
Cultural Resources	BLM, State Historic Preservation Officer (SHPO), Advisory Council on Historic Preservation and affected land-managing agencies	Section 106 consultation
	BLM	Permits to excavate
	BLM, BIA, affected tribes	Consultation with affected American Indians
	BLM	Consultation with affected Native American groups regarding treatment of human remains and associated objects
	BLM and affected land-managing agencies	Permit for study of historical, archaeological, and paleontological resources ⁴
	BLM and affected land-managing agencies	Permits to excavate and remove archaeological resources on Federal lands; American Indian tribes with interests in resources must be consulted prior to issuance of permits
	BLM and affected land-managing agencies	National Trails System Act compliance
Paleontological Resources	BLM	Compliance with BLM mitigation and planning standards for Paleontological resources of public lands
Air Traffic	Federal Aviation Administration (FAA), DOD	Section 1101 Air Space Permit for air space construction clearance A "No-hazard Declaration" required if structure is more than 200 feet in height Notice of Proposed Construction Permit (FAA Form 7460-1)
Rate Regulation	FERC	Federal Power Act compliance by power seller
ROW Encroachment	Nevada Division of Environmental Protection ("NDEP")	Registration certificate
ROW Encroachment	Nevada DOT	ROW encroachment permit
Regulation of Public Utility	Public Service Commission	Authority to construct and certificate of need
Utility Facility Construction	Nevada Public Utilities Commission	Construction of Utility Facilities permit

Issue	Regulatory Agency or Authority	Permit, License, Compliance, or Review
Water Quality Degradation, Construction Storm Water Discharge and Ground Disturbance	NDEP	Floodplain use permits, Clean Water Act 401, and 404 permits, Storm water pollution prevention plan (SWPPP), SPCC plan and Temporary Permit Application for Working in Waterways (Temporary Rolling Stock Permit)
		Construction Stormwater General Permit (NVR1000000)
		Surface area disturbance permit
ROW Easement	Division of State Lands	Easement onto state lands
Cultural and Paleontological Resources	Nevada State Museum	Permit to investigate antiquities
	Nevada State Historic Preservation Office	Notification of discoveries, consultation with affiliated groups, Project review under Section 106 of the NHPA
Biological Resources	Division of Forestry	Compliance to survey for identification of plant species
	Division of Forestry	Permit for lawful take of protected plants
	Division of Wildlife	Compliance
Construction and Operation	Clark County Board of Commissioners	Special Use
Land Use	Clark County Building Department	Grading and Fencing Permit
Dust Control	Clark County Department of Air Quality Management	Dust Control Permit/Surface Area Disturbance Permit
Dust Control	Washoe County	Dust Control Permit/Surface Area Disturbance Permit
Construction and Operation	Appropriate County Board of Commissioners	Special Use
Land Use	Appropriate County Building Department	Grading and Fencing Permit
Dust Control	NDEP ¹	County Dust Control Permit/Surface Area Disturbance Permit

¹ Clark and Washoe Counties regulate surface area disturbance permits. For all other Nevada Counties, surface area disturbance permits are regulated by NDEP

**INITIAL UEPA APPLICATION FOR A PERMIT TO CONSTRUCT
THE TRANSMISSION OPEN PLANNING PROCESS FOR RENEWABLE ENERGY ZONES
UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT**

List of Exhibits

- Exhibit A: Project Vicinity/Location Map**
- Exhibit B: Proposed Renewable Energy Zones**
- Exhibit C: Copy of the Public Notice and Affidavit of Publication**
- Exhibit D: Copy of Certificate of Service**

EXHIBIT A
PROJECT VICINITY/LOCATION MAP

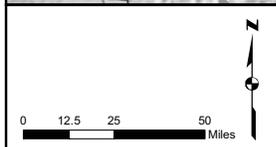
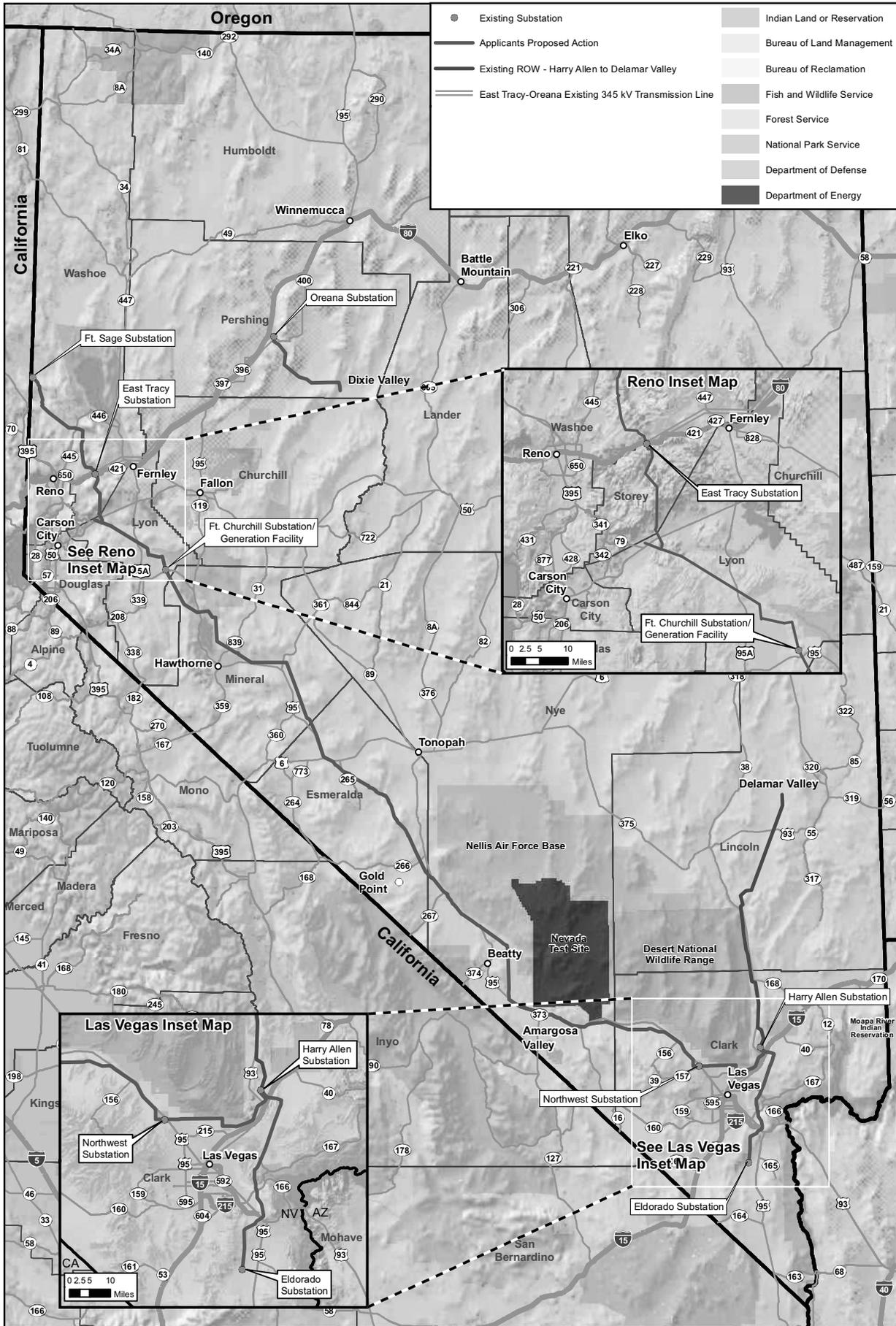


EXHIBIT A
Proposed Project Transmission Route
 Renewable Transmission Initiative
 Preliminary Plan of Development



EXHIBIT B
PROPOSED RENEWABLE ENERGY ZONES

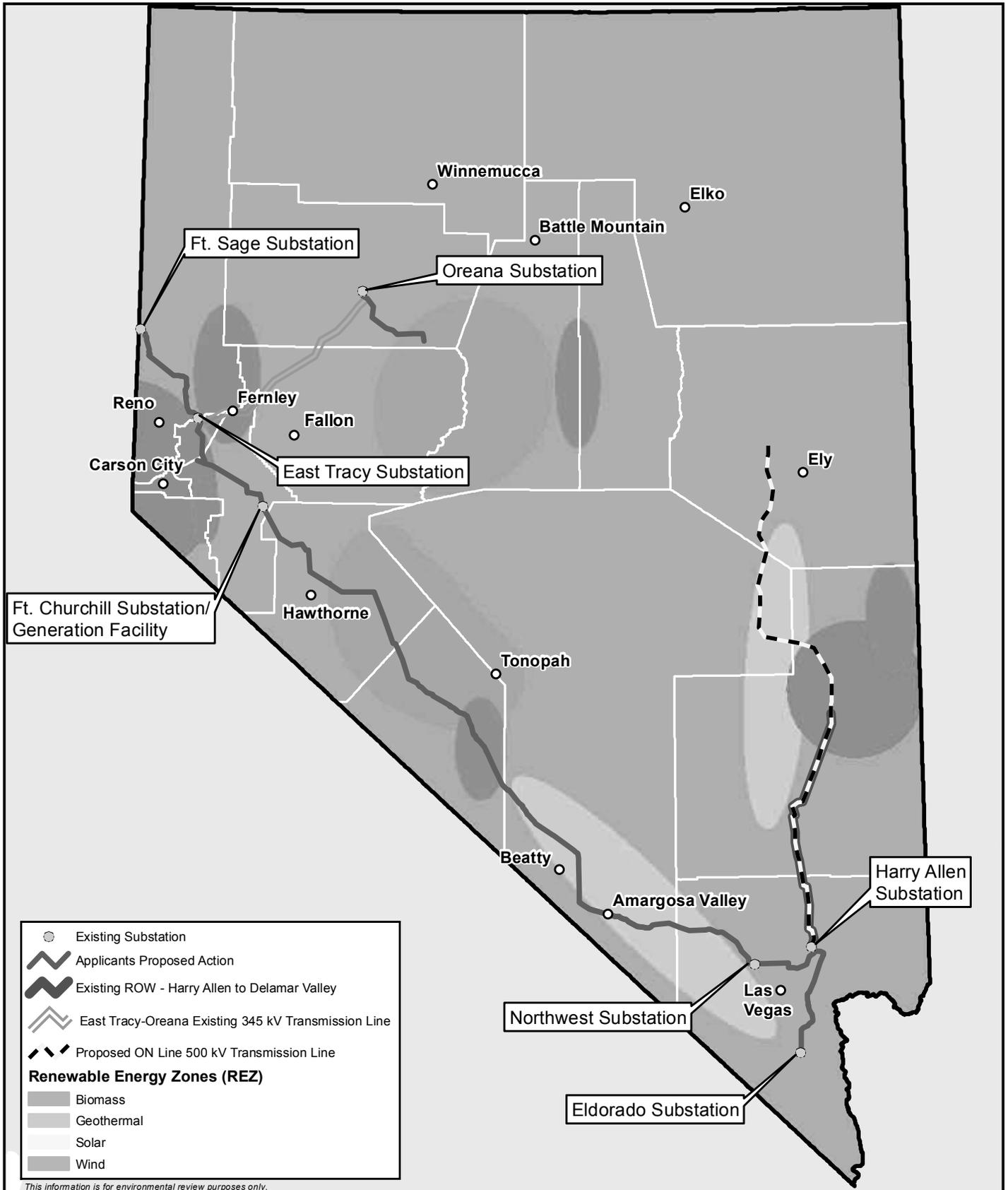


EXHIBIT C
PUBLIC NOTICE AND AFFIDAVITS OF PUBLICATION

RENO NEWSPAPERS INC

Publishers of

Reno Gazette-Journal

955 Kuenzli St • P.O. Box 22,000 • Reno, NV 89520 • 775.788.6200

Legal Advertising Office 775.788.6394

NEVADA ENERGY
6100 NEIL RD
JENNIFER D. FEDINEC
RENO NV 89511-1132

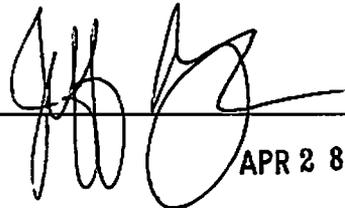
Customer Acct# 341658
PO# OPEN TRANS UEPA
Ad# 1000751320
Legal Ad Cost \$193.09

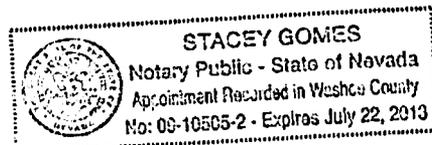
STATE OF NEVADA
COUNTY OF WASHOE

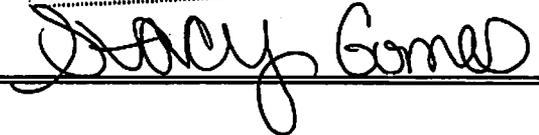
Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper between the dates: **04/28/2011 - 04/28/2011**, for exact publication dates please see last line of Proof of Publication below.

Subscribed and sworn to before me

Signed: _____


APR 28 2011





Proof of Publication

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA NOTICE OF INITIAL APPLICATION Nevada Power Company and Sierra Pacific Power Company, doing business as NV Energy ("NV Energy") intend to submit an initial application for a permit to construct utility facilities, namely, the Open Transmission Planning Process for Renewable Energy Zones Project (the "Project"). The Project will consist of the construction of approximately 538 miles of new overhead transmission lines and associated facilities. The new transmission line and associated facilities will be required to provide the transmission infrastructure and capacity necessary to reliably and cost effectively deliver renewable energy from renewable energy zones located in northern and west-central Nevada to markets in Nevada, California, and other areas of the southwestern United States. NOTICE OF INITIAL APPLICATION FOR A PERMIT TO CONSTRUCT UNDER UEPA FOR THE CONSTRUCTION OF APPROXIMATELY 538 MILES OF NEW OVERHEAD TRANSMISSION LINE AND ASSOCIATED FACILITIES IN CHURCHILL, CLARK, DOUGLAS, ESMEERALDA, LYON, MINERAL, NYE, PERSHING, STOREY AND WASHOE COUNTIES. Notice is hereby given to persons residing in the municipalities in which any portion of the utility facilities to be constructed are to be located. NV Energy will request a permit to construct the following utility facilities of the Project:

“Approximately 39 miles of new overhead 345 or 500 kV transmission line from the Dixie Valley in southeastern Pershing County to the existing Oreana Substation also located in Pershing County, Nevada. From the Oreana Substation, the transmission line would interconnect with existing 345 kV NV Energy overhead transmission lines and follow this existing route southwest for approximately 52 miles to the existing East Tracy Substation in Washoe County, Nevada. “Approximately 499 miles of new overhead 345 or 500 kV transmission line from the existing Fort Sage Substation in Washoe County to the existing Eldorado Substation in Clark County. The proposed Project includes the following segments: (1) 49 miles from the Fort Sage Substation to the existing East Tracy Substation located in Storey County; (2) 42 miles from the East Tracy Substation to the Fort Churchill Generation Facility in Lyon County; (3) 357 miles from the Fort Churchill Substation through Esmeralda, Mineral, Nye Counties to the existing Harry Allen Substation in Clark County; and (4) 51 miles from the Harry Allen Substation, south to the existing Eldorado Substation in southern Clark County. The proposed action would also include approximately 8 miles of new overhead 345 kV or 500 kV line to the existing Northwest Substation located in the northwest Las Vegas Valley in Clark County. NV Energy's Open Transmission Planning Process will include future renewable resource project planning near approximately 75 miles of existing transmission line right-of-way currently held by NV Energy for a 500 kV transmission route from the existing Harry Allen Substation in Clark County to the Delamar Valley in Lincoln County. The existing right-of-way follows the Southwest Intertie Project (SWIP) Utility Corridor and generally parallels the One Nevada Transmission Line Project being developed by NV Energy and Great Basin Transmission South, LLC. Because this transmission line has already been permitted with the BLM, it is not part of the Initial Application for a Permit to Construct. The contents of the Initial Application for a Permit to Construct to be submitted to the PUCN will include: 1)A description and location of the proposed utility facilities requiring a permit to construct from the PUCN, which will be located in Churchill, Clark, Douglas, Esmeralda, Lyon, Mineral, Nye, Pershing, Storey, and Washoe Counties. 2)A statement that BLM will conduct an environmental analysis of the Project as proposed, pursuant to the National Environmental Policy Act, to describe existing environmental resources within the project area, determine potential environmental impacts, and issue specific mitigation measures to reduce potential impacts to a less-than-significant level or no impact; and 3)A list of federal, state, regional and local agencies whose approval may be required for the proposed utility facilities. The UEPA application will be filed under and governed by the provisions of the UEPA. Protests and written comments about the granting of the UEPA application must be filed with the PUCN as provided by law. DATED this 26th day of April, 2011 NV ENERGY No. 751320 April 28, 2011

AFFP DISTRICT COURT
Clark County, Nevada

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)
COUNTY OF CLARK) SS:

Stacey M. Lewis, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

NV ENERGY 8344208NV 7153502

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 1 edition(s) of said newspaper issued from 04/28/2011 to 04/28/2011, on the following days:

04/28/2011

BEFORE THE PUBLIC UTILITIES
COMMISSION OF NEVADA
NOTICE OF INITIAL APPLICATION
NEVADA POWER COMPANY AND
SIERRA PACIFIC POWER
COMPANY, doing business as NV
Energy ("NV Energy") intend to
submit an initial application for a
permit to construct utility
facilities, namely, the Open
Transmission Planning Process
for Renewable Energy Zones
Project (the "Project"). The
Project will consist of the
construction of approximately 538
miles of new overhead
transmission lines and associated
facilities. The new transmission
line and associated facilities will
be required to provide the
transmission infrastructure and
capacity necessary to reliably and
cost effectively deliver renewable
energy from renewable energy
zones located in northern and
west-central Nevada to markets
in Nevada, California, and other
areas of the southwestern United
States.
NOTICE OF INITIAL APPLICATION
FOR A PERMIT TO CONSTRUCT
UNDER UEPA FOR THE
CONSTRUCTION OF
APPROXIMATELY 538 MILES OF
NEW OVERHEAD TRANSMISSION
LINE AND ASSOCIATED FACILITIES
IN CHURCHILL, CLARK, DOUGLAS,
ESMERALDA, LYON, MINERAL, NYE,
PERSHING, STOREY AND WASHOE
COUNTIES.

 EMILY GONZALEZ
Notary Public State of Nevada
No. 09-8940-1
My appt. exp. Nov. 13, 2012

Signed: Stacey M. Lewis

SUBSCRIBED AND SWORN BEFORE ME THIS, THE
28th day of April, 2011.

Emily Gonzalez
Notary Public

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NV Energy's Open Transmission Planning Process will include future renewable resource project planning near approximately 75 miles of existing transmission line right-of-way currently held by NV Energy for a 500 kV transmission route from the existing Harry Allen Substation in Clark County to the Delamar Valley in Lincoln County. The existing right-of-way follows the Southwest Intertie Project (SWIP) Utility Corridor and generally parallels the One Nevada Transmission Line Project being developed by NV Energy and Great Basin Transmission South, LLC. Because this transmission line has already been permitted with the BLM, it is not part of the Initial Application for a Permit to Construct.

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- DATED this 26th day of April, 2011
NV ENERGY

PUB: April 28, 2011
LV Review-Journal



Proof and Statement of Publication

580 Mallory Way, Carson City, NV 89701
 P.O. Box 1888, Carson City, NV 89702-2288 (775)
 881-1201

Account Number: #6435065

Legal Acct.
 NV Energy, Inc.
 6100 Neil Rd.
 Reno, NV 89511
 Attn: Connie Silveira

Jody Mudgett says:
 That (s) he is a legal clerk of the NEVADA APPEAL, a newspaper published Wednesday through Sunday at Carson City, in the State of Nevada.

Open Transmission Planning

Ad# 6460907

of which a copy is hereto attached, was published in said newspaper for the full required period of 1 time commencing on April 29, 2011, and ending on April 29, 2011, all days inclusive.

Signed: Jody Mudgett

Subscribed and sworn to before me this 29 day of April, 2011/

Amber Clavelle

Notary Public



AMBER CLAVELLE
 NOTARY PUBLIC
 STATE OF NEVADA
 Date Appointment Exp: 08-18-11
 Certificate No: 01-99154-1

STATEMENT:

Date	Amount	Credit	Balance
04/29/11	\$ 344.30	\$0	\$ 344.30

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The UEPA application will be filed under and governed by the provisions of the UEPA. Protests and written comments about the granting of the UEPA application must be filed with the PUCN as provided by law.

DATED this 28th day of April, 2011
 NV ENERGY

Pub: April 28, 2011

Ad#6460907

EXHIBIT D
CERTIFICATE OF SERVICE

CERTIFICATION OF SERVICE

I hereby certify that I have served the foregoing **INITIAL APPLICATION OF NEVADA POWER COMPANY AND SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT FOR A PERMIT TO CONSTRUCT TRANSMISSION FACILITIES AS PART OF THE RENEWABLE TRANSMISSION INITIATIVE** upon the persons listed below by email to the following:

Tammy Cordova
Public Utilities Commission of Nevada
101 Convention Center Drive, Suite 250
Las Vegas, NV 89109
tcordova@puc.state.nv.us

Beverly Bridges
Las Vegas City Clerk
City Hall, First Floor
400 Stewart Avenue
Las Vegas, NV 89101
bbridges@lasvegasnevada.gov

Leo Drozdoff
Division of Environmental Protection
Nevada Department of Conservation
and Natural Resources
901 S. Stewart Street, Suite 4001
Carson City, NV 89706-0851
khoward@ndep.nv.gov

Attorney General's Office
Bureau of Consumer Protection
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Carson City, NV 89701-4717
bcpserve@ags.nv.gov

Reese Tietje
Nevada State Clearinghouse
Dept. of Administration
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Carson City, NV 89701
clearinghouse@state.nv.us

Diana Alba
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clerkem@ClarkCountyNV.gov

Eric Witkoski
Attorney General's Office
Bureau of Consumer Protection
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ewitkoski@ag.nv.gov

Mark Harris, Planning Engineer
Public Utilities Commission of Nevada
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mpharris@puc.state.nv.us

Kelly G. Helton
Churchill County Clerk/Treasurer
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clerktreas@churchillcounty.org

Staff Counsel Division
Public Utilities Commission of Nevada
150 E. William Street
Carson City, NV 89701-3109
pucn.sc@puc.state.nv.us

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LaCinda Elgan
Esmeralda County Clerk
P.O. Box 547
Goldfield, NV 89013
celgan@citlink.net

Cherrie George
Mineral County Clerk
P.O. Box 1450
Hawthorne, NV 89415-0400
clerk-treasurer@meneralcountynv.org

US MAIL
Carol Elerick
Pershing County Clerk
P.O. Box 820
Lovelock, NV 89419

US MAIL
Nikki Bryan,
Lyon County Clerk/Treasurer
27 S. Main Street
Yerington, NV 89447

DATED this 6nd day of May, 2011.

Ted Thran
Douglas County Clerk
PO Box 218,
Minden, NV 89423-0218
tthran@co.douglas.nv.us

Sandra L. Merlino
Nye County Clerk
P.O. Box153
Tonopah, NV 89049
smerlino@co.nye.nv.us

Storey County Clerk
Drawer D
Virginia City, NV 89440
clerk@storeycounty.org

/s/ Patti Pastrell

Patti Pastrell
Legal Secretary
NV Energy