



October 17, 2012

HAND DELIVERED

Donna Skau  
Commission Secretary  
Public Utilities Commission of Nevada  
1150 E. William Street  
Carson City, NV 89701

Re: Initial Application of Copper Rays Solar, LLC for a Permit to Construct a Solar Photovoltaic Power Facility under the Utility Environmental Protection Act

Dear Ms. Skau:

Enclosed for filing with the Public Utilities Commission of Nevada (the "Commission"), please find the Initial Application of Copper Rays Solar, LLC ("Copper Rays") for a Permit to Construct a Solar Photovoltaic Power Facility under the Utility Environmental Protection Act ("UEPA"), pursuant to NRS 704.870(2).

The documents accompanying this Initial Application are:

1. Initial UEPA Application for a Permit to Construct; and
2. Exhibits A through F (*see* Table of Contents listing each Exhibit), including the required public notice and affidavit of publication (Exhibit E) and proof of service (Exhibit F).

Please apply our payment of \$200, previously submitted October 9, 2012 with our filing in Dkt. 12-10010, to the filing fee for this application.

Copper Rays requests the Commission accept this Initial Application under UEPA as complying with the statutory and regulatory requirements listed in the Application. Copper Rays will submit an Amended Application once it receives the environmental analysis prepared by the BLM.

**Holland & Hart LLP Attorneys at Law**

Phone (775) 684-6000 Fax (775) 684-6001 [www.hollandhart.com](http://www.hollandhart.com)

777 East William Street, Suite 200 Carson City, Nevada 89701

Aspen Billings Boise Boulder Carson City Cheyenne Colorado Springs Denver Denver Tech Center Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C.

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UTILITIES COMMISSION  
OF NEVADA-CARSON CITY  
2012 OCT 17 PM 3:51



If you have any questions about this filing, please do not hesitate to contact me directly at  
775-684-6015.

Very truly yours,

  
Jacqueline Bryant Rombaro  
for HOLLAND & HART LLP

JBR:taw  
Enclosures  
cc: Parties of Record

5804578\_1

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

**IN THE MATTER OF:**

Initial Application of COPPER RAYS SOLAR,                    Docket No. 12-10 \_\_\_\_\_  
LLC for a Permit to Construct A Photovoltaic  
Solar Facility Under the Utility Environmental  
Protection Act

**INITIAL APPLICATION OF COPPER RAYS SOLAR, LLC FOR A PERMIT TO  
CONSTRUCT A PHOTOVOLTAIC SOLAR FACILITY UNDER THE  
UTILITY ENVIRONMENTAL PROTECTION ACT**

**A. INTRODUCTION**

The applicant, Copper Rays Solar, LLC ("Copper Rays"), by and through the undersigned counsel and in accordance with Nevada Revised Statutes ("NRS") 704.870(2), hereby files with the Public Utilities Commission of Nevada ("Commission") an Initial Application ("Initial Application") for a Permit to Construct the Copper Rays Solar facility (the "Proposed Facility"), as described below, pursuant to the requirements of the Utility Environmental Protection Act ("UEPA") (NRS 704.820 to 704.900, and Nevada Administrative Code ("NAC") 703.415 to 703.427, specifically NAC 703.421). Copper Rays provides the following information in support of the Initial Application:

**B. LEGAL BACKGROUND**

The Proposed Facility is a photovoltaic solar-powered electric generating facility of up to 180 megawatts ("MW") proposed to be located on federal land administered by the U.S. Bureau of Land Management ("BLM") in the vicinity of Pahrump, Nevada, on which Copper Rays has made a BLM SF-299 application (See Exhibit A, Site Location Map).<sup>1</sup> A thorough review and analysis of the environmental conditions associated with the Proposed Facility will be conducted pursuant to the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321 et seq. Accordingly, an environmental assessment or environmental impact statement will be prepared for the Proposed Facility.

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<sup>1</sup> The SF-299 application filed with the BLM was submitted under Element Power Solar Development, L.L.C. and will be assigned over to Copper Rays Solar, LLC when allowed by the BLM, after the right-of-way is granted.

UEPA establishes a two-step application procedure for facilities subject to federal permitting and environmental review. This Initial Application is being filed pursuant to NRS 704.870(2)(a), if a federal agency is required to conduct an environmental analysis of a proposed utility facility, the project proponent is also required to file an application with the Commission that provides notice of the federal filing. The UEPA Initial Application provides a general description of the proposed facility and a summary of any studies that Copper Rays anticipates will be made of the environmental impact of the facility, as required by NRS 704.870.2(a)(1) and (2). Subsequently, and not later than 30 days after the issuance of the final environmental document, the applicant is required to file an amended UEPA application with the Commission pursuant to NRS 704.870.2(b)(1).

Consistent with this legal framework, this Initial Application, together with the Proposed Facility description and Exhibits A (Site Location Map), B (Regional Map), C (Legal Description), D (Federal Action and Environmental Studies), E (Public Notice), F (Proof of Publication), and G (Proof of Service to Clark County Clerk, Nevada State Clearing House and other agencies), all attached and incorporated herein by reference, contain all of the information required to be filed at this time. Additional information will be provided through an amended application once the BLM issues the results of the environmental analysis of the Proposed Facility.

Accordingly, Copper Rays requests that the Commission accept this Initial Application under UEPA as complying with the statutory and regulatory requirements set forth above. Copper Rays will submit an amended application once it receives the final environmental analysis from the BLM. At that time, Copper Rays will seek approval from the Commission of its request for a Permit to Construct the Proposed Facility pursuant to NRS 704.8905.

### **C. FACTUAL BACKGROUND**

The Proposed Facility will be located on federal land administered by the BLM in Nye County, Nevada. *See* Exhibit A, Site Location Map. Copper Rays is developing the Proposed Facility to produce clean, renewable electrical power to meet the growing demand for such power in the Western U.S. and to satisfy state renewable portfolio standards. The Proposed Facility will employ solar photovoltaic technology.

**D. NAME AND ADDRESS OF APPLICANT**

1. Copper Rays is a wholly-owned subsidiary of Element Power, US, LLC, a company incorporated under the laws of the State of Delaware.

2. Copper Rays was formed with the purpose of developing, owning and operating the Copper Rays Solar facility.

3. Copper Rays' principal place of business, mailing address and telephone number are:

Copper Rays Solar, LLC  
421 SW 6<sup>th</sup> Avenue, Suite 1000  
Portland, OR 97204  
(503) 416-0800

4. All correspondence related to this Initial Application (copy of all pleadings, notices, orders and discovery requests) should be sent to the undersigned agent:

Gina Wolf  
Senior Project Manager  
Element Power  
421 SW Sixth Ave., Suite 1000  
Portland, OR 97204

and

Jacqueline Bryant Rombardo  
Holland & Hart LLP  
777 E. William Street, Suite 200  
Carson City, Nevada 89701  
Telephone: (775) 684-6000  
Email: jbrombardo@hollandhart.com

**E. INFORMATION REQUIRED BY NAC 703.421**

Pursuant to NAC 703.421, Copper Rays submits the following information:

**1. General Description of the Location of the Proposed Facilities – NAC 703.421(0)**

(a) A general description of the location of the proposed utility facility, including a regional map that identifies the location of the proposed utility facility.

The Proposed Facility will be located on federal land administered by the BLM in Nye County, Nevada, approximately 25 miles southwest of Las Vegas adjacent to Nevada State Highway 160. *See* Exhibit A, Site Location Map. A regional map showing the location of the Proposed Facility is attached as Exhibit B. The legal description of the Proposed Facility is attached as Exhibit C. The lands defined in this Initial Application encompass approximately

7,200 acres. It is anticipated that the Copper Rays Solar facility will encompass approximately 2,000 acres.

(b) Any alternative locations for the proposed utility facility.

Factors that must be considered when identifying and evaluating potential sites for solar energy development include adequate solar resource, availability of suitable land, proximity to electrical transmission, and consideration of environmental, land use, and socioeconomic factors.

Alternative site locations considered in siting the Proposed Facility included four other locations in Nye and Clark Counties, Nevada. Alternative sites of the Proposed Facility were constrained by availability and proximity to available transmission interconnection as well as proximity to sensitive environmental, recreational, or cultural resource areas (e.g., Big Dune Area of Critical Environmental Concern, Jean/Reach Lake Special Recreational Management Area, Spanish National Historic Trail, etc.).

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

Solar Resource – Project viability depends on locating solar projects in areas with superior solar resource. The Proposed Facility site is located in one of the premier solar resource areas in the world. The area’s latitude, elevation, and percentage of annual cloud-free days make this area a preferred location for solar power generation.

Availability of Suitable Land – BLM-administered lands are suitable for solar development because sufficiently sized tracts of land could be available in the vicinity of Pahrump under a long term right-of-way grant.

Access to Bulk Transmission – It is advantageous to locate solar energy projects in close proximity to existing high voltage electrical transmission lines to reduce the costs and the need to build new transmission lines. The Proposed Facility is located in proximity to the existing Valley Electric Association transmission lines and substation.

Environmental, Land Use and Socioeconomic Considerations – Factors considered in project siting include compatible land use, distance to population centers and sensitive receptors, visual impacts, availability of access, and consideration of special management areas such as Desert Wildlife Management Areas (“DWMA’s”), Areas of Critical Environmental Concern (“ACECs”) and, Wilderness Study Areas (“WSA’s”). The Proposed Facility avoids special management areas. The Mt. Charleston and La Madre Mountain

Wilderness Areas are located approximately 8 miles north and east of the Proposed Facility, respectively; the Nopah Range Wilderness Area is located approximately 6 miles west of the Proposed Facility; the Stump Spring ACEC is located approximately 2.5 miles south of the Proposed Facility; the Kingston Range ACEC and the Old Spanish National Historic Trail are located approximately 8 miles south of the Proposed Facility.

The Proposed Facility is located in an area that is relatively sparsely populated. Surrounding land is characterized primarily by commercial operations, energy transmission infrastructure, transportation infrastructure, residential and open space. The nearest residences are located approximately 0.26 mile north of the Proposed Facility. The Proposed Facility is located within approximately 25 miles of the Las Vegas metropolitan area, which is expected to provide an ample available construction workforce. The Proposed Facility is located along Nevada State Highway 160, providing adequate infrastructure for site access.

## **2. General Description of the Proposed Utility Facilities NAC 703.421(2)**

(a) The size and nature of the proposed utility facility.

The Proposed Facility will include the following main elements:

- Photovoltaic Array field and associated interior access ways and perimeter road.
- Fixed-tilt mounting systems (including tilt brackets and tabletops) or single-axis, horizontal tracker structures supported by driven steel posts or other embedded foundation design, or a combination of both.
- Direct current (DC) Collection system comprised of underground DC cabling and combiner boxes.
- An onsite substation with 34.5kV to 230kV/220kV step-up transformers, breakers, bus work, protective relaying and associated substation equipment. The onsite substation will be connected to the Valley Electric Association Gamebird Substation via an approximately 2.6 mile 230 kV transmission line.
- An operation and maintenance building (“O&M”) with a parking area and other associated facilities of up to 5 acres. Associated facilities in the O&M area may include aboveground water storage tanks, septic systems, security gate, signage, and flagpoles and other facilities.
- Maintenance and access roads.

- A substation switchyard.
- Perimeter fencing anticipated to be designed for desert tortoise exclusion.

Construction of the Proposed Facility may require the following temporary facilities. The following temporary facilities will be removed at the end of the construction period:

- A construction staging area for construction mobilization and laydown.
- Temporary construction workforce parking area.
- Temporary construction water storage ponds

The Proposed Facility will create an economically viable source of up to 180 MW (alternating current) of clean renewable electricity that can serve the growing demand for renewable energy in the Western U.S.

(b) The natural resources that will be used during the construction and operation of the Proposed Facility.

Copper Rays anticipates minimal uses of natural resources during construction and operation. Water will be utilized for dust control and panel washing in the following estimated quantities: during construction approximately 0.3 acre feet per day for up to 12 months of construction, and during operation approximately 2 acre feet/yr. The only other natural resources Copper Rays anticipates using are those natural resources incorporated into construction materials (e.g., steel and concrete).

The following permits will be required for the Proposed Facility:

Permit	Approving Agency
Finding of No Significant Impact/Record of Decision, following evaluation of Environmental Assessment or Environmental Impact Statement	U.S. Department of the Interior, Bureau of Land Management
Temporary Land Use Permit, for geotechnical evaluation	U.S. Department of the Interior, Bureau of Land Management
Endangered Species Act Section 7 Biological Opinion/Incidental Take Authorization	U.S. Department of the Interior, U.S. Department of Fish and Wildlife
Clean Water Act Section 404 Jurisdictional Determination and Permit	U.S. Army Corps of Engineers
National Historic Preservation Act Section 106 Finding of Eligibility	U.S. Department of the Interior, Bureau of Land Management; Nevada State Historic Preservation Office

Utility Environmental Protection Act - Permit to Construct	Public Utilities Commission of Nevada
Construction Stormwater General Permit (NVR 100000)	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Water Pollution Control
General Permit to Operate Septic System	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Water Pollution Control
Clean Water Act Section 401 Certification	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Water Quality Planning
Stand-alone Surface Area Disturbance Permit	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Air Pollution Control
Conditional Permit for Disturbance or Destruction of Critically Endangered Plants	Nevada Department of Conservation and Natural Resources, Division of Forestry
Scientific Collection Permit	Nevada Department of Wildlife
Permit to Appropriately the Public Water of the State of Nevada	Nevada Department of Conservation and Natural Resources, Division of Water Resources
Right-of-way Occupancy/Encroachment Permit	Nevada Department of Transportation
Super Load Permit	Nevada Department of Transportation
Building Permit	Nye County Building Division
Conditional Use Permit	Nye County
Flood Damage Prevention Application/Permit	Nye County Floodplain Administration

**3. A summary of any studies which the applicant anticipates will be made of the environmental impact of the proposed utility facility, including a copy of all corresponding studies filed with appropriate federal agencies - NAC 703.421 (3)**

This Initial Application describes the requisite federal agency approvals for construction of the Proposed Facility and presents a general description and summary of the studies that are anticipated as part of a final environmental assessment or environmental impact statement relating to the construction of the utility facility pursuant to NRS 704.870.2(a)(1). See Exhibit D.

Site specific studies which are anticipated to be conducted are summarized as follows: biological resources (wetlands and habitat), threatened and endangered species, hydrology, cultural and visual resources, geology and minerals, soil resources, air quality, land use and recreation, traffic and transportation. All studies and supporting documents will be included in the final environmental assessment or environmental impact statement, which will be submitted to the Commission in the amended application pursuant to NAC 703.423.

**4. A copy of the public notice of the application and proof of the publication of the public notice - NAC 703.421(4)**

A summary of the Initial Application will appear in newspapers published and distributed in the area where the Proposed Facility is planned, pursuant to NRS 704.870.4(b) and NAC 703.421.4. *See Exhibit E.* A copy of the Initial Application has been filed with the clerk of each local government affected by the location(s) pursuant to NRS 704.870(a). *See Exhibit F.*

**5. Proof that a copy of the application has been submitted to the Nevada State Clearinghouse - NAC 703.421 (5)**

A copy of the Initial Application has been submitted to the Nevada State Clearinghouse within the Department of Conservation and Natural Resources. *See Exhibit G.*

**F. CONCLUSION AND REQUEST FOR RELIEF**

Copper Rays will amend and supplement this application as permitted and contemplated pursuant to NRS 704.820 to 704.900 and NAC 703.415 to 703.427. Based on this Initial Application, and any amendment or supplement thereto, Copper Rays respectfully requests that the Commission proceed in the manner required by law and, in accordance with NAC 703.535(d), issue an order that:

1. Grants a Permit to Construct the Proposed Facility, as described herein;
2. Grants such conditions and modifications that may allow for the issuance of the UJPA permit to construct or a compliance order with the condition that Copper Rays may file any outstanding required permits, licenses or approvals with the Commission prior to commencing construction of the Proposed Facility pursuant to NRS 704.890;

3. Grants such deviations from the Commission's regulations as may be in the public interest; and,
  4. Grants Copper Rays such other and further relief as the Commission may find reasonable and appropriate under the circumstances.
- DATED and respectfully submitted this 17th day of October, 2012.

HOLLAND & HART LLP

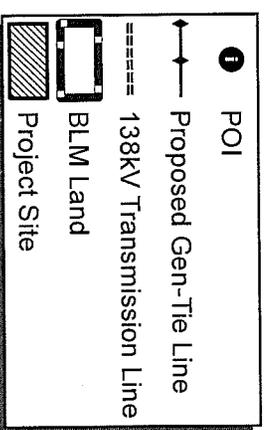
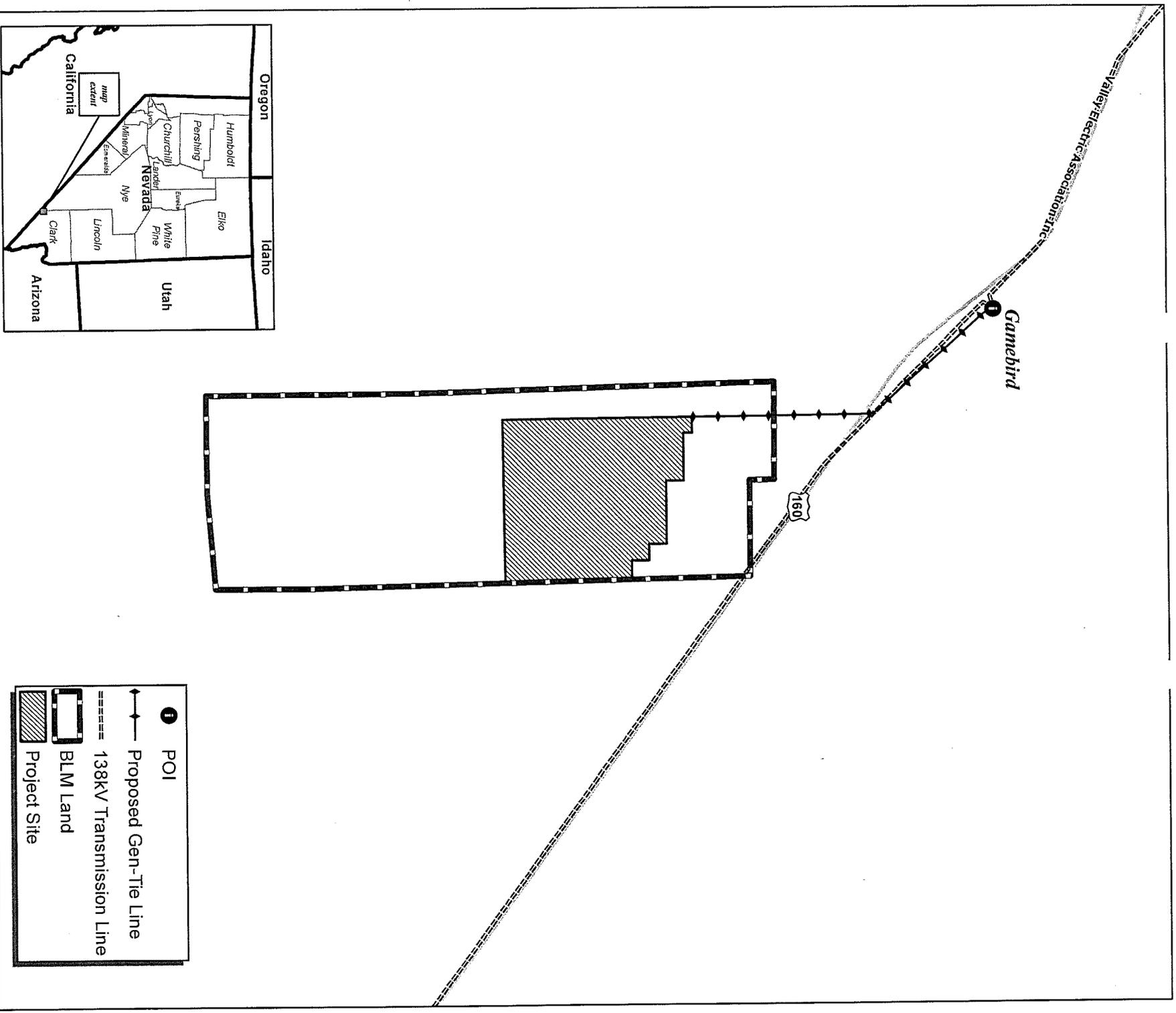
BY   
Jacqueline Bryant Rombaro  
777 E. William Street, Suite 200  
Carson City, Nevada 89701  
Attorney for the Applicant  
Copper Rays Solar, LLC

**EXHIBITS LIST**

Exhibit A	Site Location Map
Exhibit B	Regional Map
Exhibit C	Legal Descriptions
Exhibit D	Federal Action and Environmental Studies
Exhibit E	Public Notice and Affidavit of Publication
Exhibit F	Certificate of Service

## Exhibit A

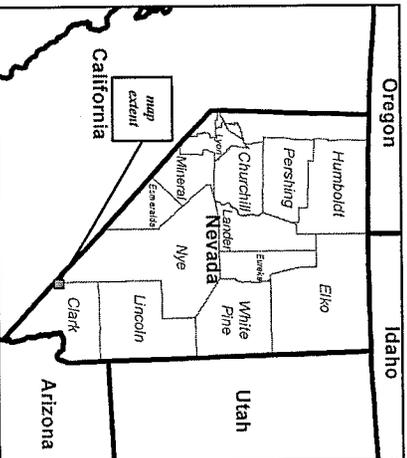
### Site Location Map



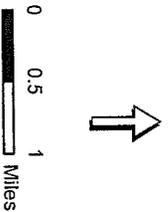
# Copper Rays Solar Farm

Site Layout

Nye County, NV

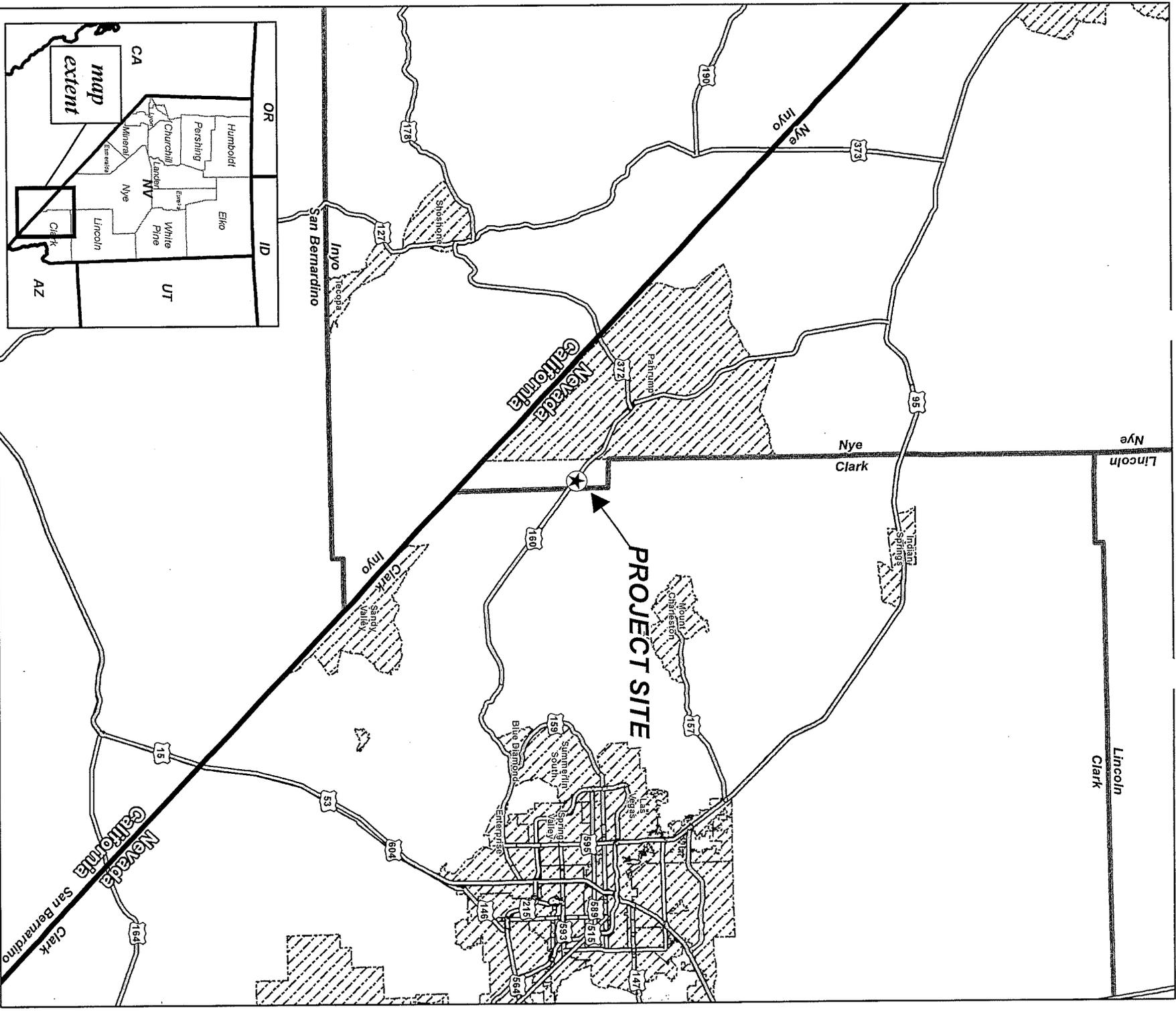


Source: Verityx Velocity Suite (2011), ESRI (2011)

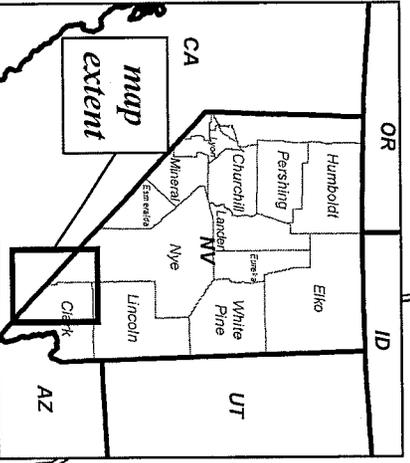


## Exhibit B

### Project Vicinity



Source: Vantage Velocity Suite (2011), ESRI (2011)



# Copper Rays Solar Farm

## Regional Map

elementpower



Nye County, NV

## Exhibit C

### Legal Description

T. 21S, R. 54E.

Sec. 13	3/4	320
Sec. 14	3/4 and 3/4N1/4	480
Sec. 23	All	640
Sec. 24	All	640
Sec. 25	All	640
Sec. 26	All	640
Sec. 35	All	640
Sec. 36	All	640
<b>Total Acreage</b>		<b>4,640</b>

T. 22S, R. 54E.

Section 1	All (including lots 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15)	640
Section 2	All (including lots 5, 6, 7, 8, 9, 10, 11, 12)	640
Section 11	All	640
Section 12	All (including lots 1, 2, 3, 4)	640
<b>Total Acreage</b>		<b>2,560</b>
<b>Total BLM Lease Acreage</b>		<b>7,200</b>

Exhibit D

## FEDERAL ACTION AND ENVIRONMENTAL STUDIES

The Copper Rays Solar Project (“Proposed Facility”) will be located on federal lands administered by the U.S. Bureau of Land Management (“BLM”). Development of the Proposed Facility will require acquisition of a right-of-way from the BLM pursuant to the Federal Land Policy Management Act (“FLPMA”). In accordance with the National Environmental Policy Act (“NEPA”), the BLM is anticipated to initiate development of an environmental assessment or an environmental impact statement (“EIS”) to assess potential environmental implications of issuing a right-of-way for the Proposed Facility. Prior to issuing a right-of-way, the BLM must first complete the NEPA process, which concludes with publication of a Final EIS (“FEIS”) and a record of decision (“ROD”). Once the ROD is issued, the grant of right-of-way can be issued, subject to conditions as may be identified in the ROD.

A number of site-specific studies are anticipated to be conducted to establish a baseline for evaluation potential impacts to the existing resources at the Proposed Facility site. These studies, and data acquired from government agency and resource databases, are anticipated to be incorporated into the EIS analysis. The resource area studies that have been or will be based on site-specific field survey data that is anticipated to be included in the EIS are listed below.

- **Biological Resources** -Existing literature and resource databases will be reviewed to identify the potential presence of plant and animal species at the Proposed Facility site. These studies will be supplemented by data collected by site-specific field surveys conducted to verify the presence or absence of specific species, identification of potential habitat, and evaluation of existing habitat quality. Field surveys will be conducted for botanical resources, including sensitive plants, and noxious weeds, wildlife, and migratory birds.
- **Threatened and Endangered Species** -Statistically-based density surveys of any threatened or endangered species will be conducted to estimate the potential density across the Proposed Facility site. As necessary, the BLM will initiate formal consultation with the U.S. Fish and Wildlife Service (“FWS”) pursuant to Section 7 of the Endangered Species Act. BLM will prepare a Biological Assessment for submittal to the FWS, and the FWS will issue a Biological Opinion and Incidental Take Permit for the Proposed Facility, as needed.
- **Hydrology** -Surface hydrology studies will be conducted to characterize storm water flows across the site.
- **Cultural Resources** -The BLM is required to demonstrate compliance with Section 106 of the National Historic Preservation Act. As part of the Section 106 compliance process, Class III cultural resource surveys will be conducted for the entire Proposed Facility site and associated facility areas. Compliance will require concurrence by the Nevada State Historic Preservation Officer (“SHPO”) on all resource report opinions and recommendations, and any required treatment or management plans. In addition, the BLM will consult with potentially affected Native American Tribes.
- **Visual Resources** -The EIS will include an evaluation of the visual impacts of the Proposed Facility. A visual analysis will be conducted using identified key observation points (“KOPs”) and preparation of visual simulations of the proposed facilities.

In addition, the following studies are anticipated to be incorporated into the EIS to provide a broad basis for decision maker consideration including the following:

- Geology and Minerals
- Soil Resources
- Air Quality
- Land Use and Recreation
- Traffic and Transportation
- Socioeconomic
- Hazardous Materials and Solid Wastes

**Exhibit E**

**Public Notice and  
Affidavit of Publication**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA  
NOTICE OF APPLICATION FOR A PERMIT TO CONSTRUCT UTILITY FACILITY  
UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT**

Copper Rays Solar, LLC (the "Company") is submitting, pursuant to the Nevada Utility Environmental Protection Act ("UEPA"), an application to the Public Utilities Commission of Nevada (the "Commission") for authority and a permit to construct the Copper Rays Solar facilities, a photovoltaic solar-powered electric generating facility, under Nevada Revised Statutes, Chapter 704, Sections .820 to .900, and Nevada Administrative Code, Chapter 703, Section 415 to 427. The Copper Rays Solar facility will be located within Nye County approximately 25 miles southwest of Las Vegas, Nevada, adjacent to Nevada State Highway 160, on approximately 2,000 acres of 7,200 acres of leased land administered by the U.S. Bureau of Land Management ("BLM"), Southern Nevada District Office, for which Company has submitted a Standard Form 299 application, in the vicinity of Pahrump, Nevada.

This Copper Rays Solar facility is being undertaken to generate up to 180 nominal megawatts ("MW") of new electric power to provide reliable electric power consistent with state renewable energy portfolio objectives; and will include:(1) a new solar power plant with a nominal generating capacity of approximately 180 MW; (2) an onsite substation, with 34.5 kV ("kilovolt") to 230 kV/220 kV step-up transformers; (3) an underground and overhead 34.5 kV collection system to convey electricity from the solar field to the onsite substation and (4) an approximately 2.6 mile long 230 kV transmission line to connect the onsite substation with the existing Valley Electric Association Gamebird Substation.

The BLM is anticipated to conduct a thorough environmental analysis of this facility and the Copper Rays Solar facility, pursuant to the National Environmental Policy Act, which will analyze the environmental impacts of the Copper Rays Solar facility.

The contents of the UEPA Initial Application will include, but are not limited to:

- 1 A general description of the location of the proposed facility, including (a) a regional map that identifies the location of the proposed utility facility, (b) any alternative locations for the proposed utility facility, and (c) the reasons why the location is best suited for the proposed utility facility;
- 2 A general description of the proposed utility facility, including, (a) the size and nature of the proposed utility facility, and (b) the natural resources that will be used during the construction and operation of the proposed utility facility;
- 3 A summary of any studies which the applicant anticipates will be made of the environmental impact of the proposed utility facility, including a copy of all corresponding studies filed with appropriate federal agencies; and
- 4 A description of how the utility facility and related transmission facilities will aid in providing customers with reliable service and will serve the public interest.

A copy of the application will be available on the Commission's website following the Company's filing of the Initial Application. Additional information about the UEPA process and a person's right to

participate in that process can be found in Nevada Revised Statutes and Nevada Administrative Code Chapters 703 and 704.

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)  
COUNTY OF NYE) SS:

Phyllis Trice, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Pahrump Valley Times, a bi-weekly newspaper regularly issued, published and circulated in the City of Pahrump, County of Nye, State of Nevada, and that the advertisement, a true copy attached for,

HOLLAND & HART LLP

6846000HOL

8164240

was published in said Pahrump Valley Times in 1 edition(s) of said newspaper issued from 10/17/2012 to 10/17/2012, on the following days:

10/17/2012

*Copied Page 5 of 2 #78946.8887*

SEE ATTACHED

Signed:

*Phyllis Trice*

SUBSCRIBED AND SWORN BEFORE ME THIS, THE

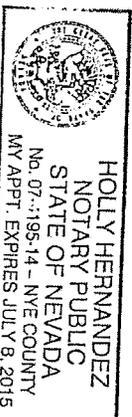
17 day of

*October*

, 2012.

Notary Public

*Holly Hernandez*



**BEFORE THE PUBLIC UTILITIES  
COMMISSION OF NEVADA  
NOTICE OF APPLICATION FOR A PERMIT TO CON-  
STRUCT UTILITY FACILITY UNDER THE  
UTILITY ENVIRONMENTAL PROTECTION ACT**

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This Copper Rays Solar facility is being undertaken to generate up to 180 nominal megawatts ("MW") of new electric power to provide reliable electric power consistent with state renewable energy portfolio objectives; and will include: (1) a new solar power plant with a nominal generating capacity of approximately 180 MW; (2) an onsite substation, with 34.5 KV ("kilovolt") to 230 KV/220 KV step-up transformers; (3) an underground and overhead 34.5 KV collection system to convey electricity from the solar field to the onsite substation and (4) an approximately 2.6 mile long 230 KV transmission line to connect the onsite substation with the existing Valley Electric Association Gamebird Substation.

The BLM is anticipated to conduct a thorough environmental analysis of this facility and the Copper Rays Solar facility, pursuant to the National Environmental Policy Act, which will analyze the environmental impacts of the Copper Rays Solar facility.

The contents of the UEPA Initial Application will include, but are not limited to:

1. A general description of the location of the proposed facility, including (a) a regional map that identifies the location of the proposed utility facility, (b) any alternative locations for the proposed utility facility, and (c) the reasons why the location is best suited for the proposed utility facility;
2. A general description of the proposed utility facility, including, (a) the size and nature of the proposed utility facility, and (b) the natural resources that will be used during the construction and operation of the proposed utility facility;
3. A summary of any studies, which the applicant anticipates, will be made of the environmental impact of the proposed utility facility, including a copy of all corresponding studies filed with appropriate federal agencies; and
4. A description of how the utility facility and related transmission facilities will aid in providing customers with reliable service and will serve the public interest.

A copy of the application will be available on the Commission's website following the Company's filing of the Initial Application. Additional information about the UEPA process and a person's right to participate in that process can be found in Nevada Revised Statutes and Nevada Administrative Code Chapters 703 and 704.  
PUBLISH: Oct. 17, 2012.

## Exhibit F

### Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Holland & Hart LLP and on October 17, 2012, I caused to be served a true and correct copy of the Initial Application Of Copper Rays Solar, LLC For A Permit To Construct A Solar Photovoltaic Power Facility Under The Utility Environmental Protection Act via electronic and/or U.S. Mail to the following parties:

Sandra Merlino  
Nye County Clerk  
1520 E. Basin Ave., Suite 108  
Pahrump, NV 89060

Eric Witkowski  
Chief Deputy Attorney General  
Office of the Attorney General  
Bureau of Consumer Protection  
10791 W. Twain Avenue, Suite 100  
Las Vegas, NV 89135-3022  
bepserver@ag.nv.gov

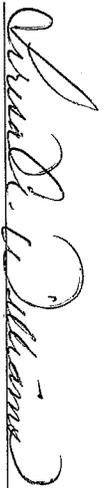
Nevada Division of Environmental Protection  
901 S. Stewart Street, Suite 4001  
Carson City, Nevada 89701

Nevada Department of Conservation and Natural Resources  
c/o Nevada State Clearinghouse  
901 S. Stewart Street, Suite 5001  
Carson City, Nevada 89701  
clearinghouse@budget.state.nv.us

Tammy Cordova  
Staff Counsel  
Public Utilities Commission of Nevada  
9075 West Diablo drive, Suite 250  
Las Vegas, Nevada 89148

Nevada State Clearinghouse  
209 E. Musser Street, Room 200  
Carson City, NV 89701  
clearinghouse@budget.state.nv.us

Dated this 17th day of October, 2012.

  
An employee of Holland & Hart LLP

PUBLIC UTILITIES COMMISSION OF NEVADA DRAFT NOTICE  
(Applications, Tariff Filings, Complaints, and Petitions)

RECEIVED-PUBLIC  
UTILITIES COMMISSION  
OF NEVADA-CARSON CITY  
2012 OCT 17 PM 3: 51

Pursuant to Nevada Administrative Code ("NAC") 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include ONE COPY of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(4)(a)):

Application of Copper Rays Solar, LLC for authority under the provisions of the Utility Environmental Protection Act for a permit to construct a photovoltaic solar-powered electric generating facility to be known as the Copper Rays Solar Project (the "Project"), to be located in Pahrump, Nye County, Nevada.

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

The applicant is Copper Rays Solar, LLC ("Copper Rays"). Jacqueline Bryant Rombaro, Holland & Hart LLP, is legal counsel for the applicant.

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled AND the effect of the relief or proceeding upon consumers (see NAC 703.160(5)(c)):

Based on the Application, and any amendment thereto, Copper Rays respectfully requests that the Public Utilities Commission of Nevada grant to Copper Rays a permit to construct the Project. Copper Rays is developing the Project to produce clean, renewable electrical power to meet the growing demand for such power in Nevada and the Western U.S., and to satisfy state and federal renewable portfolio standards.

Copper Rays will supplement the Application as necessary pursuant to the requests and orders of the Commission

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute ("NRS") 704.069(1)<sup>1</sup>:

A consumer session is not required.

<sup>1</sup> NRS 704.069 states in pertinent part:

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.

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.

**The draft notice does not pertain to a tariff filing.**