



McDONALD·CARANO·WILSON<sup>LLP</sup>

Kathleen Drakulich  
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Reply to: Reno

December 26, 2012

Breanne Potter  
Assistant Commission Secretary  
Public Utilities Commission of Nevada  
1150 East Williams Street  
Carson City, Nevada 89701

***Re: Initial Application of Pahrump Valley Solar LLC for Permit to Construct  
Solar Facilities Under the Utility Environmental Protection Act***

Dear Ms. Potter:

Enclosed for filing please find the application of Pahrump Valley Solar LLC for a Permit to Construct Solar Facilities under the Utility Environmental Protection Act pursuant to NRS 704.870.

Should you have any questions or concerns regarding this submission, please contact me directly at 775-326-4369.

Sincerely,

McDONALD CARANO WILSON LLP

Kathleen M. Drakulich

KMD/jaf  
encl:



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

**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)):**

Pursuant to the Utility Environmental Protection Act (“UEPA”), and the provisions set forth in Chapter 704 of the Nevada Revised Statutes, and Chapter 703 of the Nevada Administrative Code, Pahrump Valley Solar LLC (“PVS”) is filing an Initial Application with the Public Utilities Commission of Nevada for a permit to construct the Pahrump Valley Solar Project (the “Proposed Project”).

**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 name of the applicant is Pahrump Valley Solar LLC, a Delaware LLC, which is a wholly-owned subsidiary of Abengoa Solar Inc., a company within the Abengoa Solar business unit of Abengoa, S.A. . Matt Stucky is the Agent for PVS.

**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(4)(c)):**

PVS is filing its Initial Application for a permit to construct the Proposed Project pursuant to the requirements of the Utility Environmental Protection Act (“UEPA”), Nevada Revised Statutes (“NRS”) Chapter 704, §§ 820-900, and Nevada Administrative Code (“NAC”), Chapter 703, §§ 415-427. PVS is developing the project to provide 225 (net) megawatts of renewable electric power using up-dated versions of proven technologies that reduce intermittent generation output while minimizing costs, maximization of renewable energy output from an optimal solar site, and meeting state and national objectives for the development and procurement of renewable energy.

PVS will submit an Amended UEPA Application to the Commission, including the Final Environmental Impact Statement (“EIS”), once it receives the Record of Decision (“ROD”) for the environmental analysis being prepared under the direction of the U.S. Bureau of Land Management.

**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.

**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.

1 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.

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

In the Matter of the Initial Application of PAHRUMP VALLEY SOLAR LLC for a Permit to Construct a Concentrating Solar and Photovoltaic Solar Facility Under the Utility Environmental Protection Act	Docket No. 12-12 _____
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**INITIAL APPLICATION OF PAHRUMP VALLEY SOLAR LLC FOR A PERMIT TO CONSTRUCT CONCENTRATING SOLAR POWER AND PHOTOVOLTAIC SOLAR FACILITIES UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT**

**A. INTRODUCTION**

The applicant, Pahrump Valley Solar LLC (“Pahrump Valley”), in accordance with Nevada Revised Statutes 704.870(2), files with the Public Utilities Commission of Nevada (“Commission”) this Initial Application (“Initial Application”) for a permit to construct the Pahrump Valley Solar Project (the “Proposed Project”), described below, pursuant to the requirements of the Utility Environmental Protection Act (“UEPA”), Nevada Revised Statutes (“NRS”) Chapter 704, §§ 820-900, and Nevada Administrative Code (“NAC”), Chapter 703, §§ 415-427. Pahrump Valley is a Delaware LLC, qualified to do business in Nevada, and is a wholly-owned subsidiary of Abengoa Solar Inc. In support of this Initial Application, Pahrump Valley provides the following information:

**B. LEGAL FRAMEWORK**

The Proposed Project will consist of a 90 MW (net) photovoltaic (“PV”) solar plant and a 135 MW (net) concentrating solar power (“CSP”) tower plant, together with related transmission facilities, to be located on federal land approximately 15 miles southeast of Pahrump, Nevada. Pahrump Valley’s parent, Abengoa Solar Inc., has filed Application NVN 089224 for a right-of-way grant with the Department of the Interior’s Bureau of Land Management (BLM), Southern Nevada District Office. Abengoa Solar Inc. intends to transfer the right-of-way application or grant to Pahrump Valley. See Exhibit A, Site Location Map. The Proposed Project will require review under the National Environmental Protection Act (“NEPA”), 42 U.S.C. § 4321, and the



1 preparation of an Environmental Assessment or Environmental Impact Statement (“EIS”) and  
2 will therefore follow the two-step application process provided for under NRS 704.870(2)(a) and  
3 NAC 703.421 and NAC 703.423. This Initial Application is being filed concurrently with the  
4 filing of the Plan of Development with the BLM. No later than 30 days after the issuance of the  
5 final federal environmental document, Pahrump Valley will file an amended UEPA application  
6 with the Commission pursuant to NRS 704.870.2(b)(1).

7 Included with this Initial Application are the Proposed Project description and the  
8 following exhibits, incorporated herein by reference:

9 Exhibit A – Site Location Map

10 Exhibit B – Regional Map

11 Exhibit C – Legal Description

12 Exhibit D – Federal Action and Environmental Studies

13 Exhibit E – NDOW Energy Project Application

14 Exhibit F – Public Notice

15 Exhibit G – Proof of Publication

16 Exhibit H – Proof of Service to the Clark and Nye County clerks, Nevada State Clearing  
17 House and other agencies

18 Pahrump Valley requests the Commission accept this Initial Application under UEPA as  
19 complying with the statutory and regulatory requirements set forth herein. Pahrump Valley will  
20 submit an amended application as required upon completion of the final environmental analysis  
21 by the BLM, and at that time will seek approval for a Permit to Construct the Proposed Project.

### 22 C. FACTUAL BACKGROUND

23 The Project will consist of a 90 MW (net) photovoltaic (“PV”) solar plant and a 135 MW  
24 (net) concentrating solar power (“CSP”) tower plant, on federal land approximately 15 miles  
southeast of Pahrump, Nevada. The objectives of the Project include utilization of up-dated  
versions of proven technologies that reduce intermittent generation output while minimizing  
costs, maximization of renewable energy output from an optimal solar site, and meeting state and  
national objectives for the development and procurement of renewable energy.

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**D. NAME AND ADDRESS OF APPLICANT**

1. Pahrump Valley Solar LLC is a Delaware LLC and is a wholly-owned subsidiary of Abengoa Solar Inc., a company within the Abengoa Solar business unit of Abengoa, S.A.

2. Pahrump Valley’s principal place of business, mailing address and telephone number are:

11500 West 13<sup>th</sup> Avenue  
Lakewood, CO 80215  
303-928-8500

3. All correspondence related to this Initial Application should be sent to the undersigned agent:

Matt Stucky  
Manager, Business Development  
Abengoa Solar Inc.  
235 Pine Street, Suite 1800  
San Francisco, CA 94104

Kathleen M. Drakulich, Esq.  
McDonald Carano Wilson LLP  
100 West Liberty Street 10<sup>th</sup> Floor  
Reno, NV 89501

**E. INFORMATION REQUIRED BY NAC 703.421**

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

*(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 Project will be located approximately 15 miles southeast of Pahrump, Nevada, south of Nevada State Highway 160, and west of Tecopa Road. The Right of Way application filed with the BLM comprises approximately 6700 acres straddling the Nye and Clark County boundary line, with the bulk of the area located in Clark County. The precise location of the facilities will be determined after the completion of additional site investigations. The ultimate footprint for the solar generating facilities will occupy approximately 2,000 acres. The point of interconnection to the transmission grid will be at Valley Electric Association’s (“VEA”) future Crazy Eyes Substation. This substation, which will be constructed on the northeast side of Nevada Highway 160 near the Tecopa Road intersection, is being permitted as part of VEA’s Hidden Hills Transmission Project. A 230 kV gen-tie line will be constructed from the Project’s electrical substation (to be located at the power block) to the Crazy Eyes Substation. While the final route of the gen-tie has not yet been determined, it is expected to be

1 approximately five miles in length. Approximately three miles of the gen-tie line will be located  
2 on land covered under right-of-way application number NVN 089224, with the remaining two  
3 miles also traversing federal land.

4 A site location map is provided as attached Exhibit A. Exhibit B is a regional map  
5 showing the location of the Right of Way application. A legal description is provided in  
6 Exhibit C.

7 *b) Any alternative locations for the proposed utility facility.*

8 Pahrump Valley considered siting a CSP tower project in Amargosa Valley, at the  
9 intersection of U.S. Route 95 and Nevada State Route 393. Biological surveys were conducted  
10 and preparation of a draft Environmental Impact Statement was begun. However, due to the  
11 proximity of the Nevada Test and Training Range to this site, personnel from Nellis Air Force  
12 Base and the U.S. Department of Defense ultimately informed the Pahrump Valley that a tower  
13 in this location would interfere with the mission of the military training operations conducted  
14 nearby. Plans for a tower project at this site were subsequently abandoned.

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

17 The Pahrump Valley provides outstanding solar resources, given the latitude and  
18 percentage of annual cloud-free days. The topography of the site is relatively flat, and well-  
19 suited to solar development, which requires very little topographic relief. In addition, because of  
20 the large footprint of the Proposed Project, large blocks of contiguous land are needed, and this  
21 requirement can be met on the BLM-administered lands. The site is in relatively close proximity  
22 to the VEA transmission lines and proposed substation. State and federally protected animal  
23 and plant species may be present on the site. However, control measures can be implemented  
24 that will successfully mitigate potentially adverse effects to these species and their habitats. Site  
access is provided by existing roads, and it is anticipated that a large construction workforce can  
be drawn from Pahrump and Las Vegas.

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

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

The CSP Facilities: The primary components of the CSP portion of the Project will be a 650-foot-tall concrete tower, four contiguous fields of glass heliostat reflectors, and a power block area where the power generating equipment and ancillary systems will be located. Each heliostat will be a mirror that is individually controlled to reflect and concentrate solar radiation on one of the four solar receivers situated near the top of the centrally located tower. The receivers will be designed to directly generate steam. The steam will be directed to the turbine/generator set in the power block, where it will be utilized to generate electricity. The heliostats will be arranged in curved rows around the tower, with a network of unpaved roads providing access to the heliostats for maintenance. The layout of all the heliostats in aggregate makes a large circle with a diameter of approximately 7,925 feet. The area of the heliostat fields, including the tower and power block in the center, is approximately 1,130 acres.

The power block is the area where the power generating equipment and ancillary systems for the CSP tower plant will be located. The footprint of the power block approximates a circle at the center of the heliostat fields. The diameter of the power block is approximately 1045 feet, or approximately 20 acres. This includes the footprint of the tower located in the center of the power block.

The six buildings that will be constructed at the power block are described in the following table:

Building	Number	Footprint (square feet)
Control and Maintenance Building	1	5,325
Heliostat Assembly Buildings / Warehouses	2	21,528 (each)
Turbine/Generator Building	1	2,568
Electrical Building	1	2,050
Water Treatment Building	1	17,933

1 In addition, an electrical substation, steam accumulator system, employee parking lots,  
2 condensate collection tank and pumps, and various other outdoor equipment will be located at  
3 the power block.

4 Photovoltaic Facilities: Pahrump Valley also intends to construct and operate a 90 MW  
5 PV facility on the site. This portion of the Project will consist of a mixture of non-concentrating,  
6 traditional PV technology and high-concentrated PV (“HCPV”) technology. The exact ratio of  
7 traditional PV modules to HCPV modules will be determined at a later date. The traditional PV  
8 modules will be mounted on either fixed-tilt structures or single-axis-tracking structures. The  
9 inverter/transformer combinations will be connected by underground cables, and the ring of  
10 interconnected inverters/transformers will be connected by underground cable to the electrical  
11 substation at the CSP tower power block. At the substation, the voltage will be stepped up again  
12 to match the voltage of the nearby VEA’s transmission line. Electricity generated by the PV  
13 system and electricity generated by the CSP tower will be transmitted to the VEA electrical  
14 system on a common gen-tie. The footprint of the PV/HCPV portion of the Project will be  
15 approximately one square mile, or 640 acres.

16 Transmission Facilities: The point of interconnection to the transmission grid will be at  
17 VEA’s future Crazy Eyes Substation. This substation, which will be constructed on the northeast  
18 side of Nevada Highway 160 near the Tecopa Road intersection, is being permitted as part of  
19 VEA’s Hidden Hills Transmission Project. A 230 kV gen-tie line will be constructed from the  
20 Project’s electrical substation (to be located at the power block) to the Crazy Eyes Substation.  
21 Approximately three miles of the gen-tie line will be located on land covered under right-of-way  
22 application number NVN 089224, with the remaining two miles traversing federal land that is  
23 covered by Abengoa’s Solar Inc.’s adjacent right-of-way application (NVN 086571).

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

It is estimated that the Proposed Project will require 350 acre-feet of water during the  
construction phase for the CSP and PV plants. Once the plants are energized, it is estimated that  
180 acre-feet annually will be needed for operations.

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During construction, gravel, aggregate, and concrete will be supplied to the Project from local batch plants and sources that provide materials per the project specifications. The likely supply point for aggregates and cement would be from a gravel pit, crusher, and cement supplier located in Pahrump. It is anticipated that only minimal additional fill material will be needed except for “select fill” for road base or foundation work. Fill materials for shaping requirements is considered to be from “cut” areas on the site. An onsite batch plant may be used to prepare the concrete needed for the Project. Power for the batch plant would be provided by either commercial means or onsite generators. Gravel will be used on access and maintenance roads throughout the Project site and as a base material beneath building foundations. Based on preliminary estimates, up to 150,000 cubic yards of gravel could be used during construction.

During operations, either natural gas or propane will be used in an auxiliary heating system. Providing up to 2% of the thermal input annually, the auxiliary natural gas or propane heating system will preheat the tower’s steam generators to more rapidly achieve proper steam superheat conditions during the daily startup and synchronization operations of the turbine.

Other natural resources for the Proposed Project will be those incorporated into construction materials, and those consumed for transportation of workers and materials to the project site.

The following permits are anticipated for the Proposed Project. This list is expected to evolve as the Project progresses through the development and engineering phases and through environmental analysis and final site selection. Not all of these may be required.

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Issuing Agency	Permit/Authorization Required	Regulated Activity
Federal		
U.S. Bureau of Land Management (BLM)	National Environmental Policy Act (NEPA) Record of Decision (ROD) NEPA (PL 91-190, 42 USC 4321-4347, January 1, 1970, as amended by PL 94-52, July 3, 1975, PL 94-83, August 9, 1975, and PL 97-258, §4(b), Sept. 13, 1982)	Proposed facilities located on BLM-managed lands require a BLM-issued right-of-way grant, which requires NEPA compliance.
U.S. Army Corps of Engineers (USACE), St. George Office	Right-of-way Grant FLPMA of 1976 (Public Law [PL] 94-579); 43 USC 1761-1771; 43 Code of Federal Regulations (CFR) 2800	Required for long-term use of BLM land.
U.S. Bureau of Land Management (BLM)	Clean Water Act (CWA) Section 404 permit or determination of no jurisdictional waters 33 USC 1344	Activities that involve discharge (placement) of dredged or fill materials into waters of the U.S. as defined by Section 404 of the CWA. Ephemeral washes that drain into waters of the U.S. are under USACE jurisdiction.
U.S. Bureau of Land Management (BLM)	Section 106 of the National Historic Preservation Act (NHPA) of 1966 NHPA 106 (PL 89-665; 16 USC 470 <i>et seq.</i> )	Completion of cultural and historical resources surveys, Section 106 consultation is required prior to issuance of the ROD
U.S. Fish and Wildlife Service (USFWS)	Endangered Species Act Section 7 consultation with USFWS and Biological Opinion Endangered Species Act (PL 93-205, as amended by PL 100-478 [16 USC 1531 <i>et seq.</i> ]); 50 CFR 402	Potential direct or indirect impacts to federally listed threatened and Endangered Species and/or associated habitat.
U.S. Fish and Wildlife Service (USFWS)	Bald and Golden Eagle Protection Act 16 USC 668-668(d)	Potential take of bald/golden eagles, survey, assessment of operational impacts
Federal Aviation Administration (FAA)	Notice of Proposed Construction or Alteration	Notice to the FAA is required for any construction that is more than 200 feet above ground level
U.S. Department of Defense	Review for potential impact on military overflights and operations	Project acceptability reviewed in connection with NEPA analysis
State		
Nevada Division of	Storm Water Pollution	A project-specific SWPPP



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Environmental Protection, Bureau of Water Pollution Control	Prevention Plan (SWPPP) NRS 445A, NAC 445A	is required.
Nevada Division of Environmental Protection, Bureau of Water Pollution Control	Temporary Discharge Permit NRS 445A.300-730, NAC 445A.070-348, NAC 445A.810-925	Needed for the discharge of water used during hydrostatic testing, if applicable.
	NEV permit (groundwater discharge permit) NRS 445A	Required for discharge of wastewater into evaporation ponds
Nevada Division of Environmental Protection, Bureau of Water Quality Planning	Clean Water Act, Section 401 33 USC 1251 <i>et seq.</i>	Required if Section 404 permit is necessary
Nevada Division of Environmental Protection, Bureau of Air Pollution Control	Chemical Accident Prevention Program/Authority to Construct and Permit to Operate NRS 459.380	Required if threshold quantities of designated highly hazardous substances will be stored or released at site
Nevada Division of Water Resources	Permit to change the place and manner of use of water rights NRS 533.345, 533.372	Required to allow water rights to be used in Project area for power generation
State of Nevada Historic Preservation Office Determination of Effect Concurrence	Section 106 of the National Historic Preservation Act (NHPA) of 1966 16 USC 470 <i>et seq.</i> , NRS 383	Completion of Section 106 consultation is required prior to issuance of the ROD. Potential effects of the Project on historic properties are considered.
Nevada Department of Wildlife	Letter of Authorization	Removal of any desert tortoise from the construction site
Nevada Department of Wildlife	Industrial Artificial Pond Permit NRS 502.390	Required if water quality of pond could cause death of wildlife
Nevada Department of Forestry	Rare and Endangered Plant Permit NRS 527.260-527.300	Required for destruction or removal of endangered plants
Nevada Department of Forestry	Native Cacti and Yucca Salvaging Permit NRS 527.050-527.110	Required for salvage and transport of cacti and yuccas



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Nevada Department of Motor Vehicles and Public Safety Nevada State Fire Marshal Division	Hazardous Material Permit or Roving Permit	Required for storage of five gallons or more of flammable liquid inside or 10 gallons or more of flammable liquid outside for 30 days or more. Also required for storage of 10 gallons or more of combustible liquid inside or 25 gallons or more of combustible liquid outside for 30 days or more. Roving Permit is needed if storage tanks will be moved to different staging areas on the Project site.
Nevada Department of Transportation (NDOT)	NDOT Right-of-way Encroachment Permit NRS 408.423, 408.210, NAC 408	Required for construction activities within NDOT right-of-way.
Nevada Department of Transportation (NDOT)	Over Legal Size/Load Permit NRS 484.337-775, NAC 484.300-580	Required for transportation of oversized loads to site
Public Utilities Commission of Nevada	Permit to Construct - Utility Environmental Protection Act (UEPA) permit NRS 704.820-704.900, Nevada Administrative Code (NAC) 704.9063, NAC 703.415-427	Under the Utility Environmental Protection Act (UEPA), this permit is required prior to construction of certain utility facilities, including renewable energy generators with capacity greater than 70 MW
Clark County		
Clark County Planning Department	Title 30 Land Use/Special Use Permit	Construction of Project on lands within Clark County
Clark County Planning Department	Development Agreement	Typically required as a condition of use permit
Clark County Department of Business Licenses	Business License	Required for business location in unincorporated Clark County
Clark County Department of Air Quality and Environmental Management (DAQEM)	Authorities to Construct and Permits to Operate	Required to construct and operate new (minor or major) stationary sources with the potential to emit air pollutants
DAQEM	Surface Area Disturbance Permit	Required for dust control during construction
Clark County Fire Department	Permit Survey Form and Permit	Hazardous material use and storage

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Clark County Building Department	Grading Permit	Required for land disturbance, clearing vegetation, rough grading
Clark County Building Department	Building Permit, fencing permits, electrical permits	Required for specific elements of Project construction
Clark County Public Works	Encroachment Permit	Required if any work will be done within a County Right-of-Way
Nye County		
Pahrump Regional Planning Commission ("PRPC")	Conditional Use Permit	Required within Pahrump Regional Planning District
Nye County Planning Department	Land Use Application	Required for Conditional Use Permit
Nye County Planning Department	Site Development Plan	Required prior to issuance of building and construction permits
Nye County Planning Department	Development Security Agreement	Required for development within Pahrump Regional Planning District
Nye County Bureau of Fire Protection	Fire Safety Compliance Certification	Building and operation fire safety
Nye County Planning Department	Flood Damage Prevention Permit	Certification of flood zone locations
Nye County Building Division	Building Permit	Required for structures
Nye County Department of Public Works	Encroachment Permit	Required for encroachment on County Right-of-Way

**3. A summary of any studies which Pahrump Valley 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).**

Studies anticipated to be completed for the site specific review include biological resources, threatened and endangered species, hydrologic studies and confirmation of status of jurisdictional waters, cultural and historic resources, visual resources, traffic and transportation, recreation and land use, air quality, geology and mineral resources. The final environmental documents will include these studies, which will be provided to the Commission in the amended UEPA application pursuant to NAC 703.423.

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

A summary of the Initial Application has been published in newspapers published and distributed in the area where the Proposed Project will be constructed pursuant to NRS 704.870.4(b) and NAC 703.421.4. The public notice and affidavit of publication is provided in

1 Exhibits F and G. In addition, a copy of the Initial Application has been filed with the clerk of  
2 each local government affected by the location of the Proposed Project, pursuant to NRS  
3 704.870(a). See the certificate of service provided as Exhibit H.

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

6 Exhibit F is the required proof of service.

7 **6. Pursuant to NRS 701.600-640, proof of compliance with Nevada Department of**  
8 **Wildlife Energy Cost Recovery Fund program.**

9 Exhibit E is the cost-estimate received from NDOW in compliance with this statute.

10 **F. CONCLUSION AND REQUEST FOR RELIEF**

11 Pursuant to NRS 704.820-900 and NAC 703,415-427, Pahrump Valley will amend this Initial  
12 Application when the BLM completes its environmental analysis. Based on this Initial Application, and  
13 any amendments and supplements, Pahrump Valley respectfully requests that the Commission notice this  
14 filing as the Initial Application required by NRS 704.870(2)(a) and NRS 704.870(5). At such  
15 time as Pahrump Valley files the amended application required pursuant to NRS 704.870(2)(b),  
16 Pahrump Valley will request the Commission to issue a UEPA permit for the proposed Project.

17 Respectfully submitted this 26th day of December, 2012.

18 

19 Kathleen M. Drakulich  
20 Nevada Bar No. 2759  
21 McDonald Carano Wilson LLP  
22 2300 West Sahara Avenue, Suite 1000  
23 Las Vegas, NV 89102  
24 100 West Liberty St., 10<sup>th</sup> Fl  
Reno NV 89501  
Tel: 775-788-2000  
Fax: 775-788-2020  
Email: [kdrakulich@mcdonalddcarano.com](mailto:kdrakulich@mcdonalddcarano.com)

Counsel for Pahrump Valley Solar LLC

## **LIST OF EXHIBITS**

**EXHIBIT A SITE LOCATION MAP**

**EXHIBIT B REGIONAL MAP**

**EXHIBIT C LEGAL DESCRIPTION**

**EXHIBIT D FEDERAL ACTION AND ENVIRONMENTAL STUDIES**

**EXHIBIT E NDOW ENERGY PROJECT APPLICATION**

**EXHIBIT F PUBLIC NOTICE**

**EXHIBIT G AFFIDAVIT OF PUBLICATION**

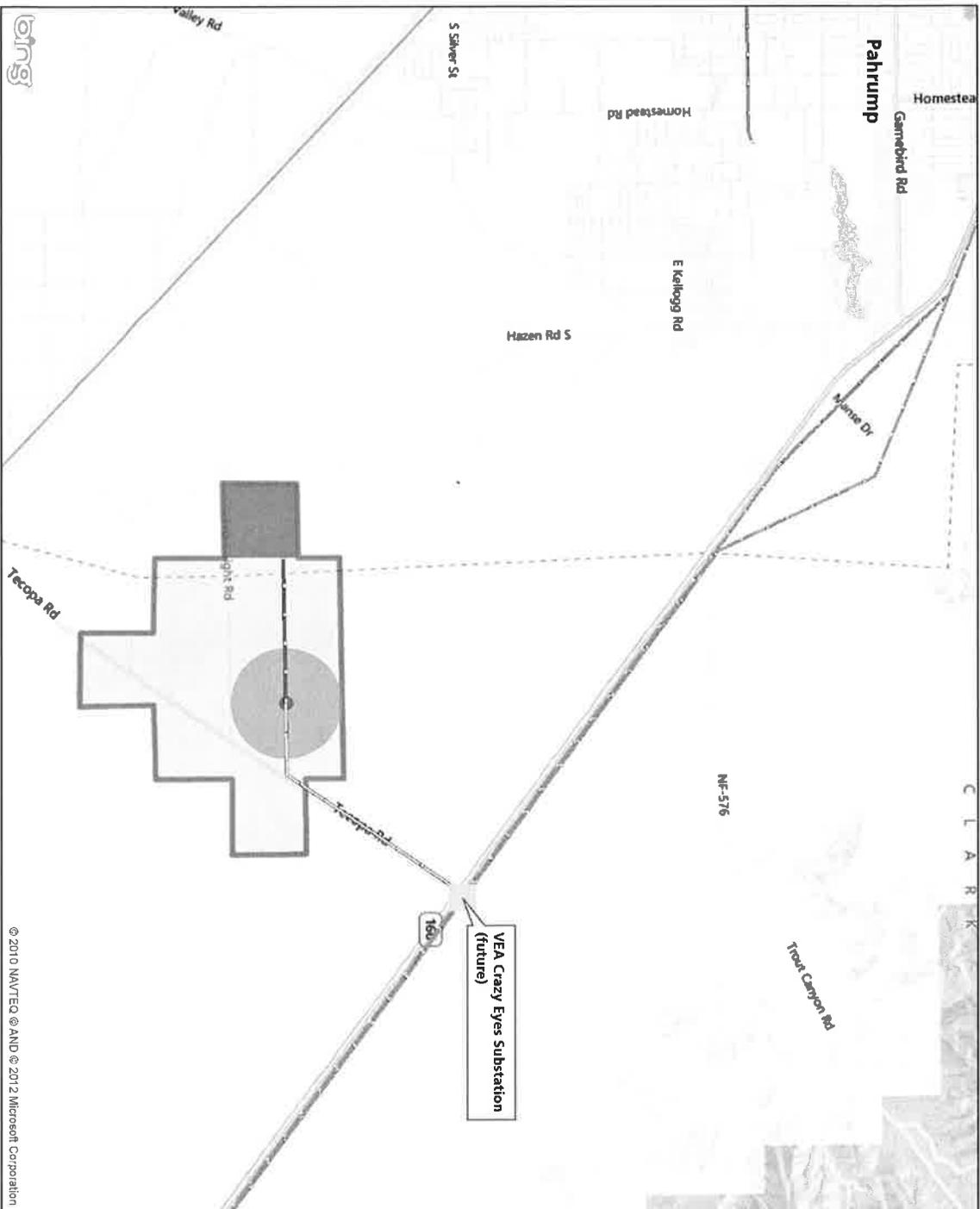
**EXHIBIT H CERTIFICATE OF SERVICE**

## **EXHIBIT A**

# ABENGOA SOLAR

## Pahrump Valley Solar Project

### Clark and Nye County, Nevada



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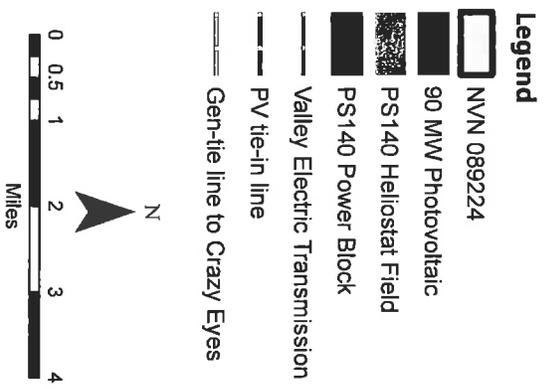
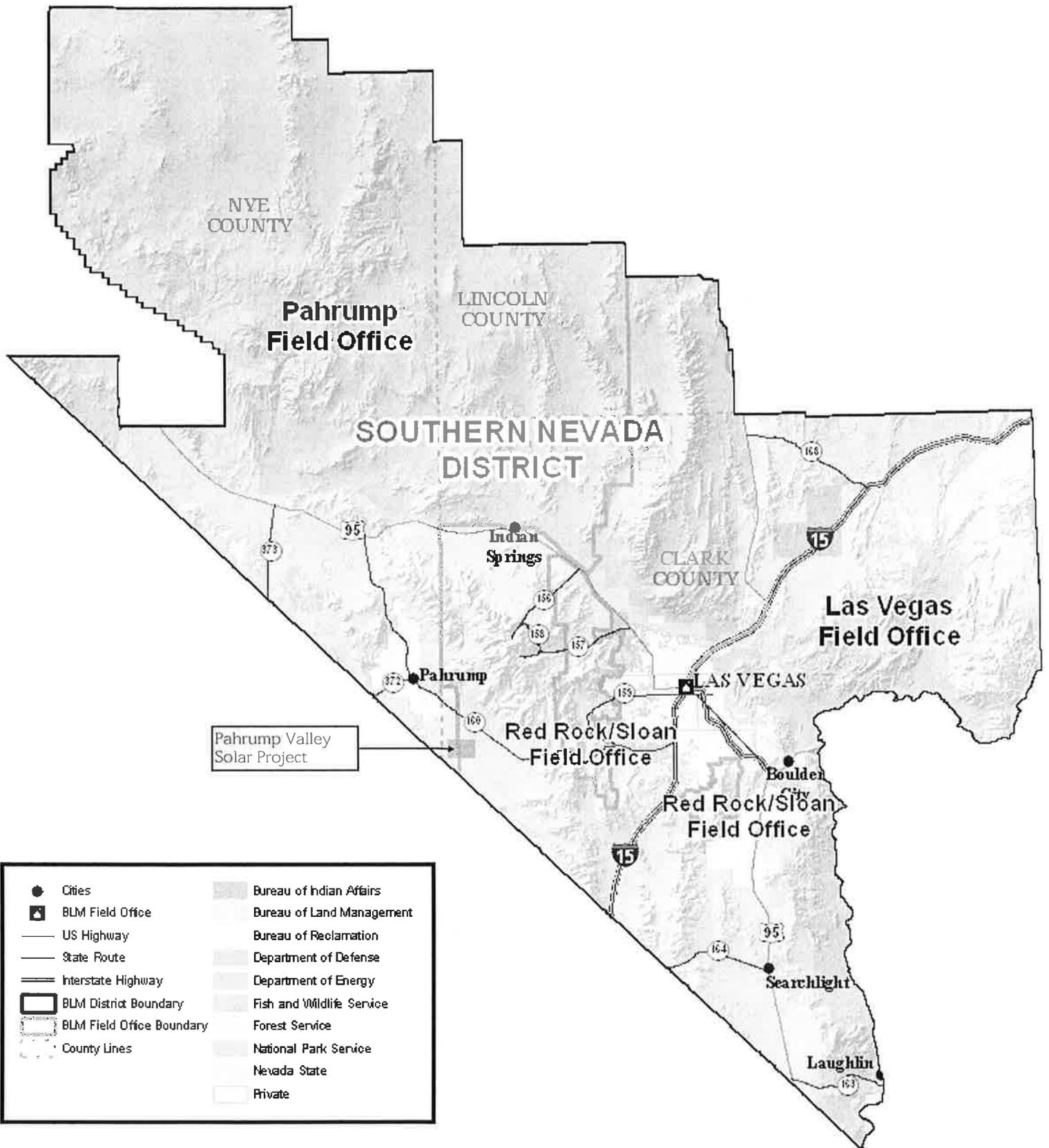


Figure 1: Site Location and Layout

## **EXHIBIT B**



Pahrump Valley Solar Project

- |   |                           |   |                           |
|---|---------------------------|---|---------------------------|
| ● | Cities                    | ■ | Bureau of Indian Affairs  |
| ■ | BLM Field Office          | ■ | Bureau of Land Management |
| — | US Highway                | ■ | Bureau of Reclamation     |
| — | State Route               | ■ | Department of Defense     |
| — | Interstate Highway        | ■ | Department of Energy      |
| ▭ | BLM District Boundary     | ■ | Fish and Wildlife Service |
| ▭ | BLM Field Office Boundary | ■ | Forest Service            |
| — | County Lines              | ■ | National Park Service     |
|   |                           | ■ | Nevada State              |
|   |                           | ■ | Private                   |

**EXHIBIT C**  
**LEGAL DESCRIPTION**  
**APPLICATION NVN 089224**

- Township 22S, Range 54E: Section 13; and
- Township 22S, Range 55E: Sections 7 (S ½), 8 (S ½), 9 (S ½), 15, 16, 17, 18, 19, 20, 21, and 29.

## EXHIBIT D

### FEDERAL ACTION AND ENVIRONMENTAL STUDIES

The Project will be located on BLM-managed land near the intersection of SR-160 and Tecopa Road. All sections are vacant, undeveloped land with the exception of Tecopa Road, which crosses through sections 10, 15, 16, 21, 20, and 29 of Township 22 South Range 55 East. The Project will be subject to the National Environmental Policy Act (NEPA) requirements of environmental review, most likely in the form of an Environmental Impact Statement. Site surveys and environmental analyses will be conducted at a level that identifies potential impacts from Project construction, operation, and maintenance. Once the environmental analysis has been completed pursuant to NEPA, the BLM can issue the grant of Right of Way, with appropriate conditions.

Site specific environmental studies will be completed in connection with the NEPA review and will be incorporated into the final NEPA documents. These studies are expected to include the following:

i) Biological Resources

Biological resources surveys will be conducted to identify the presence of special or sensitive species and habitats on the Project site. Impact analyses conducted through the NEPA process will evaluate the potential effects to the plant and animal species that may be affected by the Proposed Project. Pursuant to NRS 701.600-701.640, the Energy Planning and Conservation Fund and the Fund for the Recovery of Costs, Abengoa Solar Inc. filed application with the Nevada Department of Wildlife and has received its initial Cost Estimate (attached as Exhibit H). Abengoa is in the process of transferring this application to Pahrump Valley.

ii) Special land use designations

The Project site does not lie within any land designated for critical habitat areas, wildlife management areas, or other special management areas. However, the Stump Springs Area of Critical Environmental Concern (“ACEC”) is located to the south of the Project site. The Stump Springs ACEC is the location of a prehistoric camp and historic trail and camp.

iii) Cultural and historic resource sites and values

Cultural and historic resource sites and values within the site boundaries and adjacent to the site will be identified through an archaeological Class I Site File Search and a Class III Archaeological Inventory Survey, if necessary, as part of the NEPA analysis. A prehistoric camp and historic trail and camp are located within the Stump Springs ACEC. The Old Spanish Trail is also located in the vicinity of the site.

Consultation as required by Section 106 of the National Historic Preservation Act will be conducted as part of the NEPA process. The archaeological Class I Site File Search and Class III Archaeological Inventory Survey will be completed for the Project and reviewed and approved by the State Historic Preservation Office.

iv) Native American Tribal concerns

Pahrump Valley recognizes that there may be Native American concerns associated with the development of the land and specifically the construction and operation of the Project. Pahrump Valley will work with the BLM to coordinate consultations with the affected Tribes.

v) Recreation and OHV conflicts

The growth and development of the Las Vegas metropolitan area and the Town of Pahrump have decreased the quantity of open land used for recreation in those areas. Therefore, off-highway vehicle (“OHV”) users and recreationists are in constant search of new locations to hike, bicycle, and use OHVs. However, the Project site’s close proximity to SR-160 and the flatness of the terrain make it a less desirable location for recreation than more remote, topographically interesting locations. The BLM’s current management for the Project area for OHV use is limited to designated routes.

The few unnamed dirt roads that pass through or are in the vicinity of the Project area may be used for casual recreation. These roads will be closed as required for the installation and security of the Project facilities. Closure of any currently open routes may limit dispersed recreation opportunities in the Project area.

vi) Other environmental considerations

In addition to the resources previously discussed, construction and operation of the Project may affect visual resources, air quality, waters of the U.S., noise, socioeconomics, and transportation. Additional studies and analyses of impacts will be conducted during the NEPA process to further identify potential impacts to the resources discussed.

vii) Visual Resources

The Project will transform existing open space into a solar-powered electricity-generating facility, a source of clean, electric power. This development will entail a change in the view from key observation points in the area. Any view changes would be most often noticed by travelers along SR-160. The relatively low-profile nature of the PV panels would not impact skylines and may be largely blocked from casual view with a modest security fence. Due to the visual angles of the casual passerby, the PV plant would be largely out of site from the highway elevation. However, the 650-ft CSP tower would be visible from key observation points in the area.

The BLM’s Visual Resource Management (“VRM”) process identifies the affected landscapes and assigns visual values based on each landscape’s scenic quality, sensitivity to viewers, and distance zones. Scenic quality is determined by evaluating the overall character and diversity of landform, vegetation, water, color, and cultural features. Viewer sensitivity measures the degree of concern for change in the landscape’s visual character. Distance zones categorize the landscape’s relative visibility from key observation points or travel routes into three zones: foreground-middleground (three to five miles); background (approximately 15 miles); and seldom seen. Classes are determined by evaluating three factors: 1) scenic quality; 2) viewer sensitivity; and 3) distance zones, as described previously. Visual Resource Management Classes I and II are most valued, while Class III is moderately valued, and Class IV is the least valued.

According to the Las Vegas Resource Management Plan and Environmental Impact Statement (BLM 1998), the Project site will be located within a VRM Class IV area, which is the least valued of the VRM classes.

During the NEPA process, the visual resources evaluation for the Project will be conducted in accordance with the objectives and methods described in the BLM *Visual Resource Management Guidelines* (BLM 1986a) and the BLM *Manual Handbook - Visual Resource Contrast Rating* (BLM 1986b). The objective of the VRM Guidelines is to manage federal lands in a manner that will protect the quality of the scenic or visual values of those lands.

viii) Air Quality

Operational emissions from the Project are expected to be well below a level of significance. Impacts to air quality will mainly be related to combustion emissions and fugitive dust during the construction phase. With mitigation measures in place, these impacts will be reduced to the extent feasible.

Air pollutant emissions arise from combustion of fuels in construction and maintenance equipment, fugitive dust emissions from vehicular traffic on paved and unpaved areas, and dust emissions from soil and rock disturbances. It is likely that these impacts will be temporary and localized. Dust permits issued by the Nevada Division of Environmental Protection (“NDEP”), Clark County and Nye County will be obtained as required.

ix) Waters of the U.S.

The U.S. Army Corps of Engineers (“USACE”) regulates the discharge of dredged or fill material into waters of the United States. Non-wetland waters of the U.S. that would be under the jurisdiction of the USACE are delineated based on the presence of an ordinary high water mark as defined at 33 Code of Federal Regulations 328.3(e). The only structural changes on water bodies anticipated to result from the Project would be the effects of grading and access-road crossings on ephemeral washes within the Project area, which will be avoided when possible. Arrays will be set back from washes where feasible to minimize impacts from flooding and erosion. A Preliminary Jurisdictional Determination Report will be prepared for the project site during the NEPA process.

x) Noise

Noise is defined as any unwanted sound that interferes with normal activities or otherwise diminishes the quality of the environment. It may be intermittent or continuous, steady or impulsive, stationary or transient. Residences, motels and hotels, schools, libraries, religious institutions, hospitals, nursing homes, auditoriums, parks, and outdoor recreation areas are generally more affected by noise than commercial and industrial areas.

Noise conditions in the vicinity of the Project are generated predominantly by vehicle traffic and occasional aircraft. Noise in the vicinity of the Project will increase during construction, and will be typical of any large construction project. However, because of the remote nature of the site, there will be few human noise receptors in the vicinity of the Project. Additionally, Pahrump Valley will comply with applicable federal, state, and local requirements with respect to noise levels during construction and operation.

xi) Socioeconomics

During construction, peak staff requirements will approach approximately 1,000 personnel. It is envisioned that a significant number of qualified or trainable employees will be recruited from the local labor pool. It is expected that the workforce will live in Pahrump or Las Vegas, NV.

Operations-phase labor requirements will be less, with a projected O & M staff of approximately 40 to 50 people. It is expected that the majority of these permanent jobs will be filled from a workforce recruited locally, or as carryovers from the construction phase. The jobs and economic activity associated with the Project will result in a very positive benefit to nearby communities such as Pahrump.

xii) Transportation

A short-term increase in traffic on SR-160 is expected during the construction phase. Traffic studies will be conducted to determine whether the increase in traffic would exceed the highway's capacity.

**EXHIBIT E**  
**NDOW ENERGY PROJECT APPLICATION**



# Application for Energy Projects "Fund for the Recovery of Costs"

NRS Sections: 701.600 - 701.640

NAC Section: LCB R-038

### Applicant:

- Self
- Private Company
- Government Agency
- Other \_\_\_\_\_

Project Name Pahrump Valley Solar Project

Applicant Abengoa Solar Inc.

Mailing Address 235 Pine St, Ste 1800

City San Francisco State CA Zip Code 94104

Name of Contact Matt Stucky Phone 415-391-1685 Email matt.stucky@solar.abengoa.com

Name of Responsible Corporate Officer/Agency Rep. Armando Zuluaga Title General Manager

### Type of Project

- Solar
- Wind
- Geothermal
- Fossil Fuel
- Powerline
- Biomass

Net Maximum Generation Capacity 225 MW Estimated Design Voltage (if a powerline project) n/a

Proposed Project Size (in acres) ~2,000 acres

Proposed Length of Powerline (in miles) 5 mi gen-tie

Proposed Length of Fuel Lines (in miles for pipeline projects) < 1 mi gas line

Other notable infrastructure such as evaporation pond, electrical substation (in acres) Concentrated Solar Power tower and heliostat field; power block with steam turbine generator, water treatment system, evaporation

Project Description (use additional sheet if necessary) ponds, electrical substation; photovoltaic panel array

Solar energy project consisting of 1) a 135 MW (net) concentrated solar power tower, utilizing mirrors to concentrate solar energy, produce steam, and generate electricity; and 2) a 90 MW PV array.

Proposed County Location (map to accompany notice) Clark and Nye Counties

Estimated Project Schedule (graphic attachment acceptable)

Construction: 2015-2018

Applicant Signature

Date 11/14/12

Enclose initial payment made out to : Nevada Department of Wildlife in the amount of **\$5,000** for powerline projects greater than 50kV and less than 50 miles in length or Geothermal or Fossil Fuel power production projects, and **\$10,000** for powerline projects greater than 50kV and more than 50 miles in length, Solar or Wind power production projects.

Submit payment with application to: Nevada Department of Wildlife  
Habitat Division  
1100 Valley Road  
Reno, NV 89512



BRIAN SANDOVAL  
Governor

STATE OF NEVADA  
**DEPARTMENT OF WILDLIFE**

1100 Valley Road  
Reno, Nevada 89512  
(775) 688-1500 • Fax (775) 688-1595

KENNETH E. MAYER  
*Director*  
RICHARD L. TRASKINS, II  
*Deputy Director*  
PATRICK O. CATES  
*Deputy Director*

December 7, 2012

Mr. Armando Zuluaga, General Manager  
Abengoa Solar, Inc.  
235 Pine Street, Suite 1800  
San Francisco, CA 94104

Re: Pahrump Valley Solar Project – Nevada Revised Statutes 701.600-640 / Nevada Administrative Codes CLCB R-038  
Certified Letter#: 7008 1830 0001 5776 3774

Dear Mr. Zuluaga:

The Nevada Department of Wildlife (NDOW) appreciates Abengoa Solar, Inc. cooperating with us through the energy development cost recovery fund (NRS 701.600-640/NACL CB R-038). We are writing to provide Abengoa Solar, Inc. with an estimate of anticipated costs associated with review of the Project as it relates to wildlife resources. Costs estimated for this Project include:

Labor	\$ 3,199.03
Mileage	\$ 210.90
Per Diem	\$ 0.00
Lodging	\$ 0.00
<u>Overhead</u>	<u>\$ 596.74</u>
Total	\$ 4,006.67

Please note that this is simply a pre-review estimate; the actual project review scenario may result in a greater encumbrance of costs. While we do not foresee it at this time, NDOW may, upon consideration of the activity and progress of a project, request payment from an applicant on a quarterly basis, applying installments toward reimbursement costs. In that case, the installments would be additional to the initial deposit accompanying the application submitted by the applicant.

Please be assured, NDOW will return any unused portion of the initial deposit or portions of additional payment upon completion of our project review or when we receive notice from the applicant that the energy development project has been cancelled. If there are any questions or need for additional information, please let me know.

Sincerely,

D. Bradford Hardenbrook  
Supervisory Habitat Biologist  
Nevada Department of Wildlife, Southern Region  
4747 Vegas Drive, Las Vegas, Nevada 89108  
702.486.5127 x3600  
702.486.5133 FAX  
[bhrdnbrk@ndow.org](mailto:bhrdnbrk@ndow.org)

**EXHIBIT F**

**PUBLIC NOTICE**

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

## **PUBLIC NOTICE**

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

Pahrump Valley Solar Inc. (“Pahrump Valley”) is submitting, pursuant to the Nevada Utility Environmental Protection Act (“UEPA”), an application to the Public Utilities Commission of Nevada (the “Commission”) for authority to construct the Pahrump Valley Solar Project (the “Project”), under Nevada Revised Statutes, Chapter 704, §§ 820-900, and Nevada Administrative Code, Chapter 703, §§ 415-427. The Project will consist of a 90 MW (net) photovoltaic (“PV”) solar plant and a 135 MW (net) concentrating solar power (“CSP”) tower plant, to be located on federal land approximately 15 miles southeast of Pahrump, Nevada, south of Nevada State Highway 160, and west of Tecopa Road under an application for a right-of-way grant filed with the Department of the Interior’s Bureau of Land Management (BLM), Southern Nevada District Office (Application NVN 089224). The Right of Way application comprises approximately 6,700 acres straddling the Nye and County boundary line, with the bulk of the area located in Clark County. The precise location of the facilities will be determined after the completion of additional site investigations. The ultimate footprint for the solar generating facilities will occupy approximately 2,000 acres.

The objectives of the Project include utilization of updated versions of proven technologies that reduce intermittent generation output while minimizing costs, maximization of renewable energy output from an optimal solar site, and meeting state and national objectives for the development and procurement of renewable energy. The primary components of the CSP portion of the Project will be a 650-foot-tall concrete tower, a field of glass heliostat reflectors, and a power block area where the power generating equipment and ancillary systems will be located. The PV portion of the Project will consist of a mixture of non-concentrating, traditional PV technology and high-concentrated PV (“HCPV”) technology. The traditional PV modules will be mounted on either fixed-tilt structures or single-axis-tracking structures. The inverter/transformer combinations will be connected by underground cables, and the ring of interconnected inverters/transformers will be connected by underground cable to the electrical substation at the CSP tower power block. A gen-tie line, approximately five miles long, will connect with Valley Electric Association transmission facilities. Approximately three miles of the gen-tie line will be located on land covered under right-of-way application number NVN 089224, with the remaining two miles also traversing federal land.

The BLM will be undertaking an environmental analysis of the impact of the Project pursuant to the National Environmental Policy Act (NEPA).

Contents of the UEPA Initial Application include:

1. A general description of the location of the proposed utility 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 identified in paragraph (a) 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;
4. A copy of the public notice of the application and proof of the publication of the public notice.
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.

A copy of the application will be available on the Commission's website following Pahrump Valley'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 the Nevada Revised Statutes and the Nevada Administrative Code.

**EXHIBIT G**  
**AFFIDAVITS OF PUBLICATION**



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

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The objectives of the Project include utilization of updated versions of proven technologies that reduce intermittent generation output while minimizing costs, maximization of renewable energy output from an optimal solar site, and meeting state and national objectives for the development and procurement of renewable energy. The primary components of the CSP portion of the Project will be a 650-foot-tall concrete tower, a field of glass heliostat reflectors, and a power block area where the power generating equipment and ancillary systems will be located. The PV portion of the Project will consist of a mixture of non-concentrating, traditional PV technology and high-concentrated PV ("HCPV") technology. The traditional PV modules will be mounted on either fixed-tilt structures or single-axis-tracking structures. The inverter/transformer combinations will be connected by underground cables, and the ring of in-

terconnected inverters/transformers will be connected by underground cable to the electrical substation at the CSP tower power block. A gen-tie line, approximately five miles long, will connect with Valley Electric Association transmission facilities. Approximately three miles of the gen-tie line will be located on land covered under right-of-way application number NVN 089224, with the remaining two miles also traversing federal land.

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  - (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;
4. A copy of the public notice of the application and proof of the publication of the public notice.
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.

A copy of the application will be available on the Commission's website following Pahrump Valley'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 the Nevada Revised Statutes and the Nevada Administrative Code.

PUBLISH: Dec. 21, 2012.

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,

MCDONALD CARANO WILSON 7882000MCD 8273828

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 1 edition(s) of said newspaper issued from 12/21/2012 to 12/21/2012, on the following days:

12/21/2012

PUBLIC NOTICE BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA
NOTICE OF APPLICATION FOR A PERMIT TO CONSTRUCT UTILITY FACILITY UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT
Pahrump Valley Solar LLC ("Pahrump Valley") is submitting, pursuant to the Nevada Utility Environmental Protection Act ("UEPA"), an application to the Public Utilities Commission of Nevada (the "Commission") for authority to construct the Pahrump Valley Solar Project (the "Project"), under Nevada Revised Statutes, Chapter 704, §§ 820-900, and Nevada Administrative Code, Chapter 703, §§ 415-427. The Project will consist of a 90 MW (net) photovoltaic ("PV") solar plant and a 135 MW (net) concentrating solar power ("CSP") tower plant, to be located on federal land approximately 15 miles southeast of Pahrump, Nevada, south of Nevada State Highway 160, and west of Tecopa Road under an application for a right-of-way grant filed with the Department of the Interior's Bureau of Land Management (BLM), Southern Nevada District Office (Application NVN 089224). The Right of Way application comprises approximately 6,700 acres straddling the Nye County and Clark County boundary line, with the bulk of the area located in Clark County. The precise location of the facilities will be determined after the completion of additional site investigations. The ultimate footprint for the solar generating facilities will occupy approximately 2,000 acres.

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1. A general description of the location of the proposed utility facility, including:
(a) A regional map that identifies the location of the proposed utility facility;
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(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;
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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.
A copy of the application will be available on the Commission's website following Pahrump Valley'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 the Nevada Revised Statutes and the Nevada Administrative Code.

MARY A. LEE
Notary Public State of Nevada
No. 09-8941-1
My Appt. Exp. Nov. 13, 2016

Signed: Stacey M. Lewis

SUBSCRIBED AND SWORN BEFORE ME THIS, THE 21st day of Dec, 2012.

Mary A. Lee
Notary Public

**EXHIBIT H**

**CERTIFICATE OF SERVICE**

354342.2

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 26<sup>th</sup> day of December, 2012, caused to be served by either electronic mail or U.S. Mail, a true and correct copy of the foregoing document on each of the persons identified on the following list:

Regulatory Staff  
Public Utilities Commission of Nevada  
1150 E William  
Carson City NV 89701  
[pucn.sc@puc.nv.gov](mailto:pucn.sc@puc.nv.gov)

Eric Witkoski  
Chief Deputy Attorney General  
Bureau of Consumer Protection  
555 E Washington St, Ste 3900  
Las Vegas NV 89101  
[bcpserv@ag.nv.gov](mailto:bcpserv@ag.nv.gov)

Tammy Cordova, Staff Counsel  
Public Utilities Commission of Nevada  
101 Convention Center Dr, Ste 250  
Las Vegas NV 89109  
[tcordova@puc.nv.gov](mailto:tcordova@puc.nv.gov)

Nevada State Clearing House  
209 E Musser St., Room 200  
Carson City NV 89701  
[clearinghouse@budget.state.nv.us](mailto:clearinghouse@budget.state.nv.us)

Misti Gower  
Nevada Division of Environmental  
Protection  
901 S Stewart St., Ste 4001.  
Carson City NV 89701  
[mgower@ndep.nv.gov](mailto:mgower@ndep.nv.gov)

Nevada Dept of Conservation and  
Natural Resources  
c/o Nevada State Clearing House  
901 S Stewart St., Ste 5001  
Carson City NV 89701  
[clearinghouse@budget.state.nv.us](mailto:clearinghouse@budget.state.nv.us)

Sandra Merlino  
Nye County Clerk  
1520 E Basin Ave., Ste 108  
Pahrump NV 89060  
[smerlino@co.nye.nv.us](mailto:smerlino@co.nye.nv.us)

Diana Alba  
Clark County Clerk  
200 Lewis Ave., 5<sup>th</sup> Fl  
PO Box 551601  
Las Vegas NV 89155  
[clerkem@clarkcountyNV.gov](mailto:clerkem@clarkcountyNV.gov)

  
An employee of McDonald Carano Wilson LLP

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