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**08-12010**

**Public Utilities Commission of Nevada**

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**Filed For: Great Basin Transmission LLC**

**In accordance with NRS Chapter 719,  
this filing has been electronically signed and filed  
by: /s Kathleen Drakulich**

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**By electronically filing the document(s),  
the filer attests to the authenticity of the electronic signature(s) contained  
therein.**

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**This filing has been electronically filed and deemed to be signed by an  
authorized agent or  
representative of the signer(s) and  
Great Basin Transmission LLC**



McDONALD·CARANO·WILSON<sup>PC</sup>

Sylvia Harrison  
[sharrison@mcdonaldcarano.com](mailto:sharrison@mcdonaldcarano.com)

Reply to: Reno

December 23, 2014

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

***Re: Docket No: 08-12010 – Amended Application of Great Basin Transmission, LLC for a Permit to Construct the Harry Allen to Eldorado Project Pursuant to the Utility Environmental Protection Act***

Dear Ms. Potter:

Accompanying this letter, for filing with the Public Utilities Commission of Nevada in the above-referenced docket, and pursuant to the Utility Environmental Protection Act (UEPA), is the Amended Application of Great Basin Transmission, LLC for authority and a permit to construct the Harry Allen to Eldorado Project Pursuant to the Utility Environmental Protection Act. A Draft Notice is attached to the Application.

Please contact me at (775) 326-4360 if you have any questions or require additional information.

Sincerely,

Sylvia Harrison

SH/ajb  
Enclosures



**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 (NAC 703.160(4)(a)):**

Amended Application of Great Basin Transmission, LLC for authority under the provisions of the Utility Environmental Protection Act for a permit to construct and operate a 500 kilovolt electrical transmission facility and ancillary facilities to be known as the "Harry Allen to Eldorado Project".

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

The applicant is Great Basin Transmission, LLC.

**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 (NAC 703.160(4)(c)):**

Based on the Application and any amendment or supplement thereto, Great Basin Transmission, LLC respectfully requests that the Public Utilities Commission of Nevada grant it a Permit to construct the Harry Allen to Eldorado Project. Great Basin Transmission, LLC is developing the proposed facility to produce 500 kV of electrical power to meet the growing demand for such power in Nevada and the Western U.S.

**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.

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<sup>1</sup> 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.

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

AMENDED APPLICATION OF GREAT BASIN  
TRANSMISSION, LLC FOR A PERMIT TO  
CONSTRUCT THE HARRY ALLEN TO  
ELDORADO PROJECT PURSUANT  
TO THE UTILITY ENVIRONMENTAL  
PROTECTION ACT

Docket No. 08-12010

**AMENDED APPLICATION OF GREAT BASIN TRANSMISSION, LLC FOR  
A PERMIT TO CONSTRUCT THE HARRY ALLEN TO ELDORADO  
PROJECT PURSUANT TO THE UTILITY ENVIRONMENTAL PROTECTION ACT**

**VOLUME I-**

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**LIST OF EXHIBITS**

- Exhibit 1      Regional Map**
- Exhibit 2      Draft Environmental Assessment**
- Exhibit 3      Biological Assessment**

**VOLUME II**

- Exhibit 4      Biological Opinion**
- Exhibit 5      Final Environmental Assessment**
- Exhibit 6      BLM Finding of No Significant Impact**
- Exhibit 7      BLM Decision Record**
- Exhibit 8      Bureau of Reclamation Finding of No Significant Impact**
- Exhibit 9      Public Notice**
- Exhibit 10     Affidavit of Publication**
- Exhibit 11     Proof of Service to Nevada State Clearinghouse**
- Exhibit 12     Permits, Licenses & Approvals Already Obtained**
- Exhibit 13     Permits, Licenses & Approvals Required**
- Exhibit 14     Letter from Governor Sandoval**
- Exhibit 15     CAISO Memorandum**
- Exhibit 16     Letter from Senator Reid**

1 **BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

2 AMENDED APPLICATION OF GREAT BASIN /  
3 TRANSMISSION, LLC FOR A PERMIT TO /  
4 CONSTRUCT THE HARRY ALLEN TO /  
5 ELDORADO PROJECT PURSUANT / Docket No. 08-12010  
6 TO THE UTILITY ENVIRONMENTAL /  
7 PROTECTION ACT /

8 **AMENDED APPLICATION OF GREAT BASIN TRANSMISSION, LLC FOR**  
9 **A PERMIT TO CONSTRUCT THE HARRY ALLEN TO ELDORADO**  
10 **PROJECT PURSUANT TO THE UTILITY ENVIRONMENTAL PROTECTION ACT**

11 Pursuant to the Nevada Utility Environmental Protection Act (“UEPA”), and the  
12 provisions of Chapter 704 of the Nevada Revised Statutes (“NRS”) and Chapter 703 of the  
13 Nevada Administrative Code (“NAC”), Great Basin Transmission, LLC, a Delaware limited  
14 liability company (“Applicant”), hereby files its Amended Application with the Public Utilities  
15 Commission of Nevada (“Commission”) for a permit to construct (“UEPA Permit”) a 500-  
16 kilovolt (“kV”) electrical transmission facility and ancillary facilities to be known as the “Harry  
17 Allen to Eldorado Project,” sometimes referred to herein as “the Project”. The Amended  
18 Application is made pursuant to Nevada Revised Statutes (“NRS”) 704.820 to 704.900 and  
19 Nevada Administrative Code (“NAC”) 703.415 to 703.427. Applicant submits the following  
20 information in support of its Amended Application.

21 **I. INTRODUCTION**

22 Applicant intends to construct, operate, and maintain a new 500kV overhead transmission  
23 line which will stretch between a northern terminus at NV Energy’s existing 500 kV Harry Allen  
24 Substation (approximately 20 miles northeast of Las Vegas) and a southern terminus at the  
25 existing 500 kV Eldorado Substation in Eldorado Valley. The Project will be located entirely in  
26 Clark County, Nevada. The Project will cross federal lands managed by the Bureau of Land  
27 Management (“BLM”), requiring a right-of way (“ROW”) grant, as well as federal lands  
28

 **MCDONALD-CARANO-WILSON**  
100 WEST LIBERTY STREET, 10<sup>TH</sup> FLOOR • RENO, NEVADA 89501  
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1 managed by the Bureau of Reclamation (“Reclamation”) which have been withdrawn for  
2 Reclamation project purposes, requiring a right-of-use (“ROU”) authorization. The BLM and  
3 Reclamation determined that an environmental assessment (“EA”) was required pursuant to the  
4 National Environmental Policy Act of 1969 (“NEPA”) to assist with identification of any  
5 potentially significant impacts that could result from implementation of the Project. BLM acted  
6 as the lead agency in the preparation of the EA, with Reclamation acting as a cooperating  
7 agency. The Final EA was issued on November 25, 2014. The EA, the BLM’s Decision Record  
8 (“DR”), BLM’s Finding of No Significant Impact (“FONSI”), and Reclamation’s FONSI are  
9 attached hereto as Exhibits 5, 6, 7, and 8.

11 Nevada has established a two-step procedure for applying for a UEPA permit to construct  
12 a utility facility when a federal agency is required to conduct an environmental analysis for the  
13 facility. Pursuant to the requirements of NRS 704.870 in effect when Applicant initiated the  
14 process to secure the ROW and ROU, Applicant filed its initial application for a UEPA Permit  
15 with the Commission on December 5, 2008 (“Initial Application”). The Commission assigned  
16 the Initial Application Docket Number 08-12010. NRS 704.870 formerly required an amended  
17 application (“Amended Application”) for a UEPA Permit to be filed within thirty (30) days of  
18 the issuance of the final environmental assessment. Accordingly, Applicant is now submitting  
19 this Amended Application in compliance with NRS 704.870 and NAC 703.423.

## 22 II. INFORMATION REGARDING THE APPLICANT

23 Great Basin Transmission, LLC is a Delaware limited liability company and an affiliate  
24 of LS Power Development, LLC, a Delaware limited liability company (“LS Power”). LS Power  
25 is a privately held company that, together with its affiliates, is focused on the development,  
26 investment and management of reliable and environmentally responsible power generation and  
27 transmission assets in the United States. Applicant advises that it may file a request with the  
28

1 Commission to assign this application and its rights under this docket to another affiliate of LS  
2 Power prior to issuance of a compliance order in this docket to preserve all commercial  
3 opportunities as described herein.

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

6  
7 Kathleen Drakulich  
8 Sylvia Harrison  
9 McDonald Carano Wilson LLP  
10 100 West Liberty Street, 10<sup>th</sup> Floor  
11 P.O. Box 2670  
12 Reno, Nevada 89505-2670  
13 [kdrakulich@mcwlaw.com](mailto:kdrakulich@mcwlaw.com)  
14 *Attorneys for Applicant*

15  
16 Mark Milburn, Vice President  
17 LS Power Development, LLC  
18 400 Chesterfield Center, Suite 110  
19 St. Louis, MO 63017  
20 [mmilburn@lspower.com](mailto:mmilburn@lspower.com)

### 21 III. RESPONSES TO REQUIRED DISCLOSURES

22 The information required by NAC 703.421 and NAC 703.423 is provided as follows:

23 A. NAC 703.423(1). Description of Location

24 1. *A general description of the location of the proposed utility facility, including a regional map that identifies the location of the proposed utility facility (NAC 703.423(1)(a)).*

25 The transmission line will stretch between a northern terminus at NV Energy's  
26 existing 500 kV Harry Allen Substation (approximately 20 miles northeast of Las Vegas)  
27 and a southern terminus at the existing 500 kV Eldorado Substation in Eldorado Valley,  
28 operated by Southern California Edison; both in Clark County, Nevada (see Exhibit 1).  
The proposed alignment is approximately 60 miles long and would be located parallel  
and adjacent to existing transmission facilities and within designated utility corridors for  
the majority of the alignment. The project will exit the Harry Allen Substation to the

1 northeast, following an adjacent 500 kV transmission line for approximately 5 miles  
2 across Dry Lake Valley to the area of the Crystal Substation, but will not interconnect at  
3 Crystal. The project alignment would then turn south and parallel up to three existing  
4 500 kV transmission lines in the utility corridor along the eastern side of the Dry Lake  
5 Range and Sunrise Mountains, past Lava Butte, and enter the City of Henderson near the  
6 Las Vegas Wash. The project would continue south through eastern Henderson and  
7 parallel up to four existing high voltage lines along the western side of the River  
8 Mountains down to the Boulder Highway crossing. From Boulder Highway crossing, the  
9 project would parallel three high voltage lines southwest through the Dutchman Pass area  
10 and enter the northwestern part of Eldorado Valley. The project then turns south in  
11 Eldorado Valley and runs within a major utility corridor along the eastern side of the  
12 McCullough Range down to the southern terminus at the Eldorado Substation. A  
13 regional map is provided in Exhibit 1.  
14  
15

16  
17 ***2. A legal description of the site of the proposed utility facility, with the***  
18 ***exception of electric lines, gas transmission lines, and water and wastewater lines, for***  
19 ***which only a detailed description of the site is required (NAC 703.423(1)(b)).***

20 The northern terminus will be located at the Harry Allen Substation in Section 35,  
21 Township 17 S., Range 63 E. From the northern terminus, the project will traverse  
22 Sections 25, 35, and 36 of Township 17 S., Range 63 E.; Sections 15, 16, 17, 19, 20, 22,  
23 27, 30, and 34 of Township 17 S., Range 64 E.; Sections 3, 10, 15, 21, 22, 28, 32, and 33  
24 of Township 18 S., Range 64 E.; Sections 4, 5, 8, 17, 18, 19, 30, and 31 of Township 19  
25 S., Range 64 E.; Section 36 of Township 19 S., Range 63 E.; Sections 1, 11, 12, 13, 14,  
26 23, 26, 27, and 34 of Township 20 S., Range 63 E.; Sections 3, 4, 9, 16, 21, 27, 28, and  
27 34 of Township 21 S., Range 63 E.; Sections 3, 10, 14, 15, 23, 26, and 35 of Township 22  
28 S., Range 63 E.; Sections 2, 3, 4, 8, 9, 17, 18, 19, 30, and 31 of Township 23 S., Range



1 63 E.; Sections 13, 24, 25, and 36 of Township 23 S., Range 62 E.; Sections 1, 12, 13, 24,  
2 25, and 36 of Township 24 S., Range 62 E.; and Sections 1 and 2 of Township 25 S.,  
3 Range 62 E. The southern terminus will be located at the Eldorado Substation in Section  
4 2, Township 25 S., Range 62 E.  
5

6 **3. *Appropriately scaled site plan drawings of the proposed utility facility,***  
7 ***vicinity maps, and routing maps (NAC 703.423(1)(c)).***

8 A vicinity and route map is provided in Exhibit 1.  
9

10 B. NAC 703.423(2). Description of Facility

11 **1. *The size and nature of the proposed utility facility (NAC 703.423(2)(a)).***

12 The Project consists of an approximately 60 mile 500 kV single-circuit overhead  
13 electric transmission line, interconnection facilities at the Harry Allen and Eldorado  
14 Substations, fiber optic communication equipment, series compensation equipment,  
15 access roads, temporary work areas, and other associated project components and  
16 equipment. The transmission line will typically be located inside a 200-foot wide (100  
17 feet on either side of center) ROW that consists primarily of federal lands with some  
18 private easements. The majority of the transmission line will be constructed 200 feet  
19 from the closest parallel transmission line. Engineering or topographic constraints may  
20 require deviations from this 200-foot separation in certain areas along the alignment.  
21

22 The Project will primarily utilize self-supporting or guyed steel lattice towers  
23 made of galvanized steel with dulled finish. Other tower types including steel H-frames,  
24 steel monopoles, and guyed-V structures may be selected. Tower heights will range  
25 between approximately 90 and 172 feet with tower spans averaging about 1,200 to 1,600  
26 feet. Self-supporting steel poles may be used at points requiring heavy angles or dead-  
27 end structures. H-frame and monopole heights will be between about 120 and 160 feet,  
28

1 with average spans of approximately 1,200 to 1,600 feet. The size and configuration of  
2 tower foundations are dependent on tower selection and soil conditions. Self-supporting,  
3 steel-lattice towers require four footings, while the steel-lattice or tubular guyed towers  
4 require one footing for the tower base and four anchor rods for guy cables. Some  
5 foundation and guy anchors would consist of pre-cast concrete footings approximately  
6 four feet in diameter and six feet deep. Due to site-specific characteristics, some  
7 foundation and guy anchors would require cast-in-place footings. Self-supporting lattice  
8 towers would have cast-in-place concrete footings three to four feet in diameter and 12 to  
9 24 feet deep. Final footing/foundation configurations will be developed as part of the  
10 final design.

11  
12 The 500kV circuit will consist of three phases with a bundle of three sub-  
13 conductors per phase arranged in an equilateral triangle, approximately 18 inches per  
14 side. Minimum conductor height above the ground for the 500kV line will be 31 feet at  
15 212 degrees Fahrenheit based on National Electrical Safety Code (“NESC”) standards.  
16 The exact tower height and conductor clearance at each location will be governed by  
17 topography and applicable safety requirements.

18  
19 A fiber optic component will be incorporated into the transmission system that  
20 could be used for voice and data communication, protective relay telemetering, and for  
21 supervisory control and data acquisition. A redundant communications method may also  
22 be employed using fiber optic or microwave systems. It is likely that the fiber optic  
23 component will be integrated with the overhead groundwire.

24  
25 To protect the 500 kV transmission lines from direct lightning strikes, two  
26 overhead groundwires, ½-inch in diameter, would be installed on the top of the  
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structures. Current from lightning strikes would be transferred through the groundwires and structures into the ground.

The Project will interconnect with the existing Harry Allen 500 kV Substation at the northern terminus and the existing Eldorado 500 kV Substation at the southern terminus. The interconnection of the project to the existing substations will require the addition of facilities at the substation. While it is currently not anticipated that either substation will require expansions to accommodate the interconnection facilities, final design details may require expansion of the Harry Allen Substation to incorporate series compensation equipment. If it is determined that the location of the series compensation equipment should not be placed within the existing Harry Allen Substation, the equipment could be placed with the proposed 200-foot ROW near the northern terminus.

The Project will be able to utilize numerous existing access roads leading to and within the utility corridor. Some existing roads may require improvement or maintenance work to support construction activities. Where work areas are not immediately accessible from existing roads, short routes of non-graded overland access where feasible will be located in order to access the site. The construction of new spur roads will occur as necessary, to access structure sites that lack direct access from existing roads or where topographic conditions (e.g., steep terrain, rock outcrops, and drainages) prohibit safe overland access to the site.

The Project will involve crossings of multiple existing electrical distribution and transmission lines, pipelines, roadways, railroads, and other transportation and utility facilities. All applicable health and safety requirements will be incorporated into the final design and construction of the Project.

1                                   **2. The natural resources that will be used during the construction and**  
2                                   **operation of the proposed utility facility (NAC 703.423(2)(b)).**

3                                   During construction of the Project water will be used to control dust and minimize  
4                                   impacts to air and soils. Water will be trucked in from a commercial vendor or purchased  
5                                   locally from private sources using existing water rights, so no new water appropriations  
6                                   will be required. Because site conditions will vary along the route, water volume  
7                                   requirements will be determined on an as-needed basis during construction.

8                                   Fuel for construction vehicles will also be trucked in from a commercial vendor  
9                                   or purchased locally from private sources. Some blading and blasting of soils and rocks  
10                                   will be required to accommodate access roads and tower structure sites. Any excess  
11                                   foundation spoils are expected to be put to use within the ROW. Restoration of select  
12                                   roads and construction sites may be required by BLM using appropriate techniques and  
13                                   seed mixtures.

14                                   Natural resources will also be utilized by the manufacturers of Project equipment  
15                                   and hardware. Manufacturers will source the required raw materials through various  
16                                   supply chains, which could originate from any number of mining operations.

17                                   **3. Layout diagrams of the structures at the proposed utility facility and its**  
18                                   **associated equipment (NAC 703.423(2)(c)).**

19                                   Exhibit 1 provides an overview of the project alignment. Detailed layout  
20                                   diagrams which indicate the location of specific transmission towers and other facilities  
21                                   will be developed as part of the Final Plan of Development for BLM and Reclamation.

22                                   **4. Scaled diagrams of the structures at the proposed utility facility**  
23                                   **(NAC 703.423(2)(d)).**

24                                   Appropriately scaled structure diagrams are provided in Figures 2-3, 2-4, and 2-7  
25                                   of Exhibit 5.  
26  
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1                   **5. A statement concerning whether the proposed utility facility is an electric**  
2                   **generating plant or the associated facilities of an electric generating plant that uses**  
3                   **renewable energy as its primary source of energy to generate electricity.**

4                   While the Project is not an electric generating facility, this new transmission link  
5                   will create new access in Southern Nevada to the regional electricity market for existing  
6                   and proposed power generation facilities, and offer economical transmission service to  
7                   foster the development of new renewable energy resources.

8                   C.     NAC 703.423(3) A Copy and Summary of Environmental Studies

9                   The following environmental analyses and studies that have been conducted are  
10                  relevant to the Project and are included as exhibits to this application.

- 11                  •     *Southern Nevada Intertie Project, Draft Environmental Assessment, May 2012 (see*  
12                  Exhibit 2)
- 13                  •     *Southern Nevada Intertie Project, Biological Assessment, August 2014 (see Exhibit 3)*
- 14                  •     *Southern Nevada Intertie Project, Biological Opinion, November 2014 (see Exhibit 4)*
- 15                  •     *Southern Nevada Intertie Project, Final Environmental Assessment, November 2014*  
16                  *(see Exhibit 5)*
- 17                  •     *Southern Nevada Intertie Project, BLM Finding of No Significant Impact, November*  
18                  *2014 (see Exhibit 6)*
- 19                  •     *Southern Nevada Intertie Project, BLM Decision Record, November 2014 (see*  
20                  Exhibit 7)
- 21                  •     *Southern Nevada Intertie Project, Bureau of Reclamation Finding of No Significant*  
22                  *Impact, November 2014 (see Exhibit 8)*

23                  In response to Applicant's applications to the BLM for a ROW and to  
24                  Reclamation for a ROU, BLM and Reclamation determined that an EA would be  
25                  prepared in compliance with NEPA to assist in the identification of any potentially  
26                  significant impacts that could result from implementing the Project. Reclamation  
27                  participated as a cooperating agency for this effort. Since the Project would traverse  
28



1 habitat of species that are protected under the Endangered Species Act (“ESA”), a  
2 Biological Assessment (“BA”) was prepared to characterize the conditions of the existing  
3 environment and the level of disturbance that would occur from Project implementation.  
4 Formal consultation with the U.S. Fish and Wildlife Service (“USFWS”) was initiated  
5 pursuant to Section 7 of the ESA, and the USFWS rendered a Biological Opinion (“BO”)  
6 that determined the Project is not likely to jeopardize the continued existence of the  
7 Mojave desert tortoise. BLM and Reclamation released a Draft EA for review and  
8 comment by agencies and the general public in May 2012. Comment letters were  
9 received from the Nevada Department of Wildlife (“NDOW”) and Nellis Air Force Base,  
10 resulting in minor clarifications to the text of the EA. In November 2014, BLM and  
11 Reclamation released the Final EA. Concurrent with the release of the Final EA, BLM  
12 and Reclamation each issued a FONSI, and BLM released a DR. These documents  
13 concluded that the implementation of either the Proposed Action or Alternative 1 would  
14 not result in significant environmental impacts, and the DR approved the Proposed  
15 Action. In the event Alternative 1 is to be used to construct the Harry Allen to Eldorado  
16 Project, the Applicant would seek a corresponding change to the appropriate approvals  
17 from the federal agencies and the Commission.

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20  
21 The environmental studies are further summarized in Section G below in response  
22 to NAC 703.423.7.

23  
24 D. NAC 703.423(4). Reasonable Alternative Locations.

25 Since designated land use planning utility corridors and existing utility facilities  
26 occur along nearly the entire pathway between the Harry Allen and Eldorado Substations,  
27 and it is the preference of land management agencies that proposed utility facilities are  
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located within these designated corridors, no extensive alternative locations outside of the utility corridors were analyzed in the environmental analysis. The EA did analyze several minor routing alternatives associated with the Proposed Action. In addition, a reasonable alternative that was located within the same utility corridor (known as “Alternative 1”) was analyzed in the EA. For Alternative 1, the EA analyzed an arrangement where Applicant would utilize approximately 18 miles of open position on existing double-circuit transmission towers associated with NV Energy’s previously approved and constructed Harry Allen to Mead 500 kV transmission line project. This alternative includes the construction of approximately 42 miles of new transmission structures for a total length of approximately 60 miles (the same as the Proposed Action). Approximately 26.5 miles of new transmission alignment would be constructed from the Harry Allen Substation to a point in the Rainbow Gardens Area of Critical Environmental Concern (“ACEC”) (approximately mile marker 26.5), where the existing Harry Allen to Mead 500 kV transmission line double-circuit structures begin. At this location, the Harry Allen to Eldorado 500 kV conductors would be placed on the existing double-circuit structures for approximately 18 miles. Upon exiting the Harry Allen to Mead double circuit structures, approximately 14.5 miles of new transmission alignment would be constructed for the remainder of the route south to the Eldorado Substation.

The FONSI’s issued by BLM and Reclamation both conclude that the implementation of either the Proposed Action or Alternative 1 will not result in significant environmental impacts, and the DR approved the Proposed Action. In the event Alternative 1 is to be used to construct the Harry Allen to Eldorado Project, the Applicant would seek a corresponding change to the appropriate approvals from the federal agencies and the Commission. The contractual arrangement that currently



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enables the use of the existing structures in Alternative 1 is the “SNIP Option” as defined in the Transmission Use and Capacity Exchange Agreement (see Docket 10-02009) with NV Energy (the “TUA”). If the Applicant identifies the Project as the “SNIP” (as defined in the TUA) and the Project therefore ultimately forms part of the “Great Basin Segments” under the TUA, it could either be constructed in accordance with the Proposed Action or alternatively it could be constructed in accordance with Alternative 1 which would involve use of the SNIP Option as defined in the TUA. Alternatively, the Applicant (or another LS Power affiliate to which this application is assigned) may elect to construct the Project as a separate and independent project, such as pursuant to a CAISO competitive solicitation, in which case the Project would not be identified as the SNIP and would not form or be constructed as part of the Great Basin Segments pursuant to the TUA.

E. NAC 703.421(5). Proof of Public Notice

A copy of the Public Notice is included as Exhibit 9 and the Proof of Publication is included as Exhibit 10.

F. NAC 703.423(6). Proof of Submittal to the Nevada State Clearinghouse

A copy of proof of service to the Nevada State Clearinghouse is attached as Exhibit 11.

G. NAC 703.423(7) Probable Effect on Environment

*1. A reference to any studies described in Subsection 3, if applicable (NAC 703.423(7)(a)).*

The applicable environmental studies including the Environmental Assessment are referenced above in Section G (NAC 703.423(3)).



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**2. An environmental statement that includes:**

**(a) The name, qualifications, professions, and contact information of each person with primary responsibility for the preparation of the environmental statement (NAC 703.423(7)(b)(1)).**

The Project's EA was prepared by the BLM as the lead agency, with the participation of the Bureau of Reclamation as a cooperating agency. EPG, Inc. is an environmental consulting firm that assisted the federal agencies with the preparation of the environmental studies. The names and associated information for those individuals with the primary responsibility for the preparation of the EA are found in Chapter 6 of the EA (Exhibit 5). The contact information for the BLM Las Vegas Field Office is 4701 North Torrey Pines Drive, Las Vegas, Nevada, 89130, (702) 515-5000. The contact information for EPG, Inc. is 4141 North 32nd Street, Suite 102, Phoenix, Arizona, 85018, (602) 956-4370.

**(b) The name, qualifications, professions, and contact information of each person who has provided comments or input in the preparation of the environmental statement (NAC 703.723(7)(b)(2)).**

The names and associated information for those individuals who provided comments or input in the preparation of the EA are also found in Chapter 6 of the EA (Exhibit 5). The contact information for these individuals is the same as provided above.

**(c) A bibliography of materials used in the preparation of the environmental statement (NAC 703.423(7)(b)(3)).**

A bibliography of materials used in the preparation of the EA is provided in Chapter 7 of Exhibit 5.

**(d) A description of the following (NAC 703.423(7)(b)(4)).**

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***(i) The environmental characteristics of the project area existing at the time the application or amended application is filed with the Commission.***

Chapter 3 of the EA (Exhibit 5) provides a detailed description of the environmental characteristics of the project area as it currently exists.

The Project is located within a designated utility corridor adjacent to existing transmission lines. For the majority of the route, the Project will be next to two adjacent 500 kV AC transmission lines, and one 500 kV HVDC transmission line. The existing condition of the corridor is highly modified by the numerous existing electrical facilities and other industrial facilities.

The Project alignment generally traverses rural open desert areas and foothills. The soils in the project area are characterized as moderately to highly susceptible to water and wind erosion. One of the five air quality regions crossed by the project is designated as a maintenance area for particulate matter less than 10 microns (PM<sub>10</sub>), ozone (O<sub>3</sub>) (1997 8 hour standard), and carbon monoxide (CO), under the applicable National Ambient Air Quality Standards (NAAQS). The only notable surface water feature crossed by the Project is the Las Vegas Wash.

The Project area is located within the sparsely vegetated Mojave Desert scrub biome. Certain plant species that are considered Special Status Species by state and federal agencies occur in the Project area. No ESA-listed plant species are present in the Project area. There are occurrences of invasive plant species and noxious weeds in the corridor. Wildlife species that are designated as special status by federal and state agencies are present in the region, and include mammals, birds,

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invertebrates, and reptiles and amphibians. ESA-protected wildlife species, such as the Mojave desert tortoise, also occur in the Project area.

There are known National Register of Historic Places (“NRHP”)-eligible cultural sites in the Project area. These consist of 11 known historic sites including the Old Spanish Trail, and 16 prehistoric sites. The Project also has the potential to impact paleontological resources present in the area.

The majority of the Project alignment crosses lands managed by the BLM and Reclamation, with shorter segments that cross private, municipal, and county owned lands. On BLM managed lands, the project will cross the Rainbow Gardens ACEC, the River Mountains ACEC, and will be adjacent to the Sloan Canyon National Conservation Area. The Project will also cross the far eastern portion of the Clark County Wetlands Park, and the River Mountains Loop trail which is managed by the City of Henderson. The existing visual resource setting of the Project area has been highly modified by the existing transmission and other utility facilities.

***(ii) and (iii) The environmental impacts that the construction and operation of the proposed utility facility will have on the project area before and after mitigation.***

BLM and Reclamation evaluated the anticipated environmental impacts that would result from the implementation of the Project and identified prudent mitigation measures to minimize or avoid the expected Project impacts. In an effort to reduce impacts, Applicant also proactively committed to an extensive list of protective design features including

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generic and specific environmental protection and mitigation measures as part of the Project description. Additional mitigation and minimization measures were developed through the formal ESA consultation process with USFWS.

Chapter 4 of the EA (Exhibit 5) provides a thorough discussion of the anticipated environmental impacts and the mitigation measures intended to minimize or avoid those impacts. The BA and BO (Exhibits 3 and 4, respectively) also provide detailed discussions of anticipated project impacts and required mitigation measures. A summary of the Project's anticipated impacts for each affected resource is provided below.

Air Quality: Air emissions associated with the Project are primarily short-term and chiefly associated with engine exhaust due to combustion of fossil fuel in construction equipment and fugitive dust during the construction period. While vehicles will be used to drive the Project alignment for periodic maintenance, impacts to air quality from vehicle emissions will be negligible. Before construction can commence, Applicant or its construction contractor would need to obtain a Clark County Department of Air Quality ("DAQ") Dust Control Permit for Construction Activities, and related Dust Mitigation Plan. As a result of the temporary nature of air emissions and through adherence to Clark County DAQ regulations, impacts to air quality will be minimal.

Geology and Minerals: The Project may result in small amounts of excess mineral materials through excavation for structure foundations. Any excess materials will be used as backfill and spread around structure

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locations or put to use within the right-of-way. Although the potential for geologic hazards, including seismic, landslides, and subsidence, is low throughout the project area, there is always a chance these events could occur. Potential impacts would be mitigated through the selective placement of towers and access roads.

Soils: The Project area contains certain soils that are moderately to highly susceptible to water and wind erosion. The placement of tower sites and temporary access roads would be selected to avoid soils that are moderately or highly sensitive to accelerated rates of water or wind erosion. Additional mitigation measures could be required during construction of the Project in order to avoid or minimize damage resulting from erosion and prevent acceleration of natural-erosion processes.

Water Resources: After implementation of site-specific Best Management Practices (BMPs), impacts to surface water, groundwater, and water quality are expected to be negligible to minimal. Impacts related to floodplains for individual structures and roads would be negligible.

Vegetation: Applicant-proposed environmental protection measures were developed to avoid and minimize potential impacts to botanical resources from construction, operation, and maintenance of the proposed Project. Existing roads and previously disturbed areas would be used for the proposed Project alignments to the extent reasonably possible to minimize new surface disturbance. Five sensitive plant species were observed along the proposed alignment. Preconstruction surveys would be performed to flag sensitive plant species for avoidance, as well as to flag

