

BULLEN LAW, LLC
8635 W. Sahara Ave. #454
Las Vegas, NV 89117

Linda M. Bullen
702-279-4040
linda@bullenlaw.com

August 7, 2017

Ms. Trisha Osborne
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 East William Street
Carson City, Nevada 89701-3109


Re: Notice Pursuant to the Utility Environmental Protection Act of an Application to a Federal Agency by Sandstone Solar Energy, LLC for a Permit to Construct a Solar Facility and Associated Facilities

Dear Ms. Osborne:

Enclosed for filing please find the Notice Pursuant to the Utility Environmental Protection Act of an Application to a Federal Agency by Sandstone Solar Energy, LLC for a Permit to Construct a Solar Facility and Associated Facilities. Also enclosed is a check for \$200 for the filing fee associated with this submittal.

If you have any questions regarding this filing, please do not hesitate to contact me at (702) 279-4040.

Best Regards,



Linda M. Bullen
Attorney for Sandstone Solar Energy, LLC

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

2 IN THE MATTER OF:
3 Notice Pursuant to the Utility Environmental
4 Protection Act of an Application to a Federal
5 Agency by Sandstone Solar Energy, LLC for a
Permit to Construct A Solar Facility And
Associated Facilities

Docket No. 17-_____

6 **NOTICE PURSUANT TO THE UTILITY ENVIRONMENTAL PROTECTION**
7 **ACT OF AN APPLICATION BY SANDSTONE SOLAR ENERGY LLC TO A**
8 **FEDERAL AGENCY FOR AUTHORIZATION TO CONSTRUCT A SOLAR FACILITY**
9 **AND ASSOCIATED FACILITIES**

10 **I. INTRODUCTION**

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”), Sandstone Solar Energy, LLC (“SSE”) hereby files a
14 Notice with the Public Utilities Commission of Nevada (the “Commission”) that an application
15 will be filed with a federal agency for authorization to construct a concentrating solar energy
16 generation facility located on federally owned land managed by the Bureau of Land Management
17 (“BLM”) in Nye County, Nevada.

18 All correspondence related to this Notice should be sent to the undersigned counsel:

19 Linda M. Bullen
20 Bullen Law, LLC
21 8635 W. Sahara Ave. #454
22 Las Vegas, Nevada 89117
23 linda@bullenlaw.com
24 702-279-4040

25 The proposed Sandstone Plants 1-8 (the “Project”) is an up to 1,600 megawatt (“MW”)
26 concentrating solar power electric generation facility on approximately 20,000 acres of public
27 land in Nye County.

28 The Project falls within the definition of a “utility facility” as set forth in NRS 704.860
because it is a renewable energy project of 70 MW or greater. Because the Project will be on
land administered by the BLM, this Notice is being filed pursuant to NRS 704.870(2)(a). An

1 environmental review of the Project will be conducted by the BLM pursuant to the National
2 Environmental Protection Act ("NEPA"), 42 U.S.C § 4321, and an environmental impact
3 statement ("EIS") will be prepared. No later than 30 days after the issuance of the final EIS SSE
4 will file the UEPA Application with the Commission pursuant to NRS 704.870(2)(b). Upon
5 submission of the Application, SSE will seek approval from the Commission for Permits to
6 Construct ("PTC") the various phases of the Project.

7 **II. INFORMATION REQUIRED BY NAC 703.421**

8 The following Notice was prepared pursuant to NRS 704.870.2(a) and NAC 703.421.

- 9 **1. The name, address and telephone number of the person who will be filing the**
10 **application with the appropriate federal agency (NAC 703.421.1).**

11 Adam Green
12 Sandstone Solar Energy, LLC
13 520 Broadway, 6th Floor
14 Santa Monica, CA 90401

- 15 **2. The date on which the application was filed with the appropriate federal agency**
16 **(NAC 703.421.2).**

17 The SF 299 for the Project was filed with the BLM by SSE on August 7, 2017, the date
18 contemporaneous with this filing of this Notice.

- 19 **3. A general description of the location of the proposed utility facility (NAC 703.421.3).**

20 The Project will be located in a remote area of Nye County, Nevada, in the vicinity of the
21 Town of Tonopah. The solar field and all associated facilities are located on lands owned by the
22 federal government and administered by the BLM.

- 23 **4. A general description of the proposed utility facility (NAC 703.421.4).**

24 The Project consists of an up to 1,600 MW power tower solar generation facility
25 consisting of eight (8) solar towers with integrated molten salt storage, and associated power
26 blocks, heliostat mirror fields, transmission interconnection lines, access roads, water pipelines
27 and other such ancillary facilities as are typically associated with solar thermal generating
28 facilities, on approximately 20,000 acres of public land in Nye County, Nevada.

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5. Proof that a copy of the notice has been submitted to the Nevada State Clearinghouse within the Department of Conservation and Natural Resources (NAC 703.421.5).

A copy of this Notice has been submitted to the Regulatory Operations Staff of the Commission, the Nevada Attorney General's Bureau of Consumer Protection, Nevada State Clearinghouse, the Nevada Department of Conservation and Natural Resources - Division of Environmental Protection, the Nye County Clerk and others. *See* Certificate of Service attached hereto as Exhibit A.

6. Proof that a public notice of this application was given to persons residing in the municipalities entitled to receive notice by the publication of a summary of the application in newspapers published and distributed in the area in which the utility facility is proposed to be located (NRS 704.870(4)(B)).

A copy of the Affidavit of Publication of the public notice of this application is attached hereto as Exhibit B. A copy of the draft notice pursuant to NAC 703.162 is attached hereto as Exhibit C.

7. Proof of Compliance with the Nevada Department of Wildlife Energy Cost Recovery Fund Program (NRS 701.600-640).

NRS 701.610 provides that a person who files an application with the federal government for a lease or easement for a right-of-way for an energy development project or an application with the Commission or any county in the state of Nevada relating to the construction of an energy development project must file a notice of the energy development project with the Nevada Department of Wildlife ("NDOW").

The required notice to NDOW pursuant to NRS 701.610 was filed on July 27, 2017. *See* NDOW Application for Energy Projects Fund for the Recovery of Costs attached hereto as Exhibit D.

III. CONCLUSION

SSE will submit its UEPA Application at the conclusion of the federal environmental

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1 review process. At that time, it will request that the Commission issue to it a UEPA Permit to
2 Construct the Project pursuant to NRS 704.870(2)(b).

3 Respectfully submitted August 7, 2017.

4 Linda M. Bullen

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6 Bullen Law, LLC

7 Attorney for Sandstone Solar Energy, LLC

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EXHIBIT A

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2017, a true and correct copy of The Notice Of An Application By Sandstone Solar Energy, LLC To A Federal Agency For Authorization To Construct A Solar Facility And Associated Facilities was served via electronic mail to the following parties:

Public Utilities Commission
of Nevada
Staff Counsel Support
1150 E. William Street
Carson City, Nevada 89701
pucn.sc@puc.nv.gov

Public Utilities Commission
of Nevada
Ms. Tammy Cordova, Staff Counsel
1150 E. William Street
Carson City, Nevada 89701
tcordova@puc.nv.gov

Nevada State Clearinghouse
Nevada Division of State Lands
Mr. Skip Canfield
901 South Stewart Street, Suite 5003
Carson City, NV 89701-5246
nevadaclearinghouse@lands.nv.gov

Nevada Division of
Environmental Protection
Mr. Greg Lovato, Administrator
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249
glovato@ndep.nv.gov

Office of the Attorney General
Bureau of Consumer Protection
Attn: Mr. Eric Witkoski, Chief Deputy
Attorney General and Consumer Advocate
100 North Carson Street
Carson City, Nevada 89701-4717
ewitkoski@ag.nv.gov

Nevada Department of Conservation and
Natural Resources
Mr. Bradley Crowell, Director
901 South Stewart Street, Suite 1003
Carson City, Nevada 89701
bcrowell@dcnr.nv.gov

Nye County Clerk
Sandra Merlino
101 Radar Road
Tonopah, NV 89049
smerlino@co.nye.nv.us

DATED: August 7, 2017

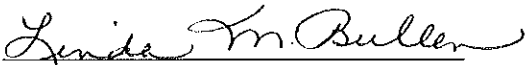

Bullen Law, LLC

EXHIBIT B

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)
COUNTY OF NYE) SS:

BULLEN LAW LLC
STE 454
8635 W SAHARA AVE
LAS VEGAS NV 89117

Account # 124204
Ad Number 0000928229

Charlotte Uyeno, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Tonopah Times-Bonanza & Goldfield News, a weekly newspaper regularly issued, published and circulated in the Town of Tonopah, County of Nye, State of Nevada, and that the advertisement, a true copy attached for, was continuously published in said Tonopah Times-Bonanza & Goldfield News in 1 edition(s) of said newspaper issued from 08/03/2017 to 08/03/2017, on the following days:

08/03/17

NOTICE -
SANDSTONE SOLAR

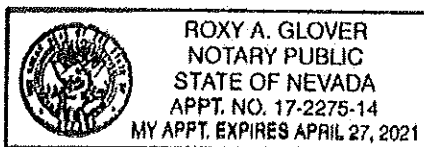
ISI

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 3rd day of August, 2017

Notary

Roxy A. Glover



BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA
NOTICE PURSUANT TO THE UTILITY ENVIRONMENTAL PROTECTION ACT OF AN APPLICATION TO A FEDERAL AGENCY BY SANDSTONE SOLAR ENERGY, LLC TO CONSTRUCT A SOLAR PLANT AND ASSOCIATED FACILITIES
Sandstone Solar Energy, LLC ("Sandstone Solar") is submitting to the Public Utilities Commission of Nevada (the "Commission"), pursuant to the Utility Environmental Protection Act ("UEPA"), Nevada Revised Statutes Chapter 704, Sections .820 to .900, and Nevada Administrative Code, Chapter 703, Sections .415 to .427, a Notice of An Application to a Federal Agency to Construct a Solar Plant and Associated Facilities. The project will consist of up to eight (8) concentrating solar power towers and ancillary facilities, including, but not limited to pipelines for the transmission of water, which will produce up to 1600 megawatt alternating current (the "Proposed Facility"). The Proposed Facility will be located approximately 25 miles northwest of Tonopah, in Nye County, Nevada, and will be part of the Sandstone Project. The contents of the Notice will include, but are not limited to: 1. A general description of the location of the Proposed Facility. 2. A general description of the Proposed Facility. 3. Proof that Notice has been submitted to the Nevada State Clearinghouse within the State Department of Conservation and Natural Resources. 4. Proof that a public notice of the Notice was given to persons residing in the municipalities entitled to receive notice by the publication of a summary of the application in a newspaper published and distributed in the area in which the Proposed Facility is proposed to be located. 5. Proof of compliance with the Nevada Department of Wildlife Energy Cost Recovery Fund Program. A copy of the Notice will be available on the Commission's website following its filing by Sandstone Solar. Additional information about the UEPA process and a person's right to participate in the process can be found in NRS and NAC Chapters 703 and 704.
PUBLISH: Aug. 3, 2017.

EXHIBIT C

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(5)(a)):

Notice Pursuant to the Utility Environmental Protection Act of an Application to a Federal Agency by Sandstone Solar Energy, LLC for a Permit to Construct A Solar Facility and Associated Facilities

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (*see* NAC 703.160(5)(b)):

**The applicant is Sandstone Solar Energy, LLC (“SSE”).
Linda M. Bullen of Bullen Law, LLC is legal counsel for the applicant.**

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

SSE is filing a Notice of an Application to a Federal Agency with the Public Utilities Commission of Nevada (the “Commission”) for an application with the Bureau of Land Management (“BLM”) to construct an up to 1,600 megawatt concentrating solar power electric generation facility consisting of eight (8) solar towers with integrated molten salt storage and associated facilities, including, but not limited to, power blocks, heliostat mirror fields, transmission interconnection lines, access roads and water pipelines on land managed by the BLM in Nye County, Nevada (the “Proposed Facility”).

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute (“NRS”) 704.069(1)¹:

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.

EXHIBIT D



BRIAN SANDOVAL
Governor

State of Nevada

DEPARTMENT OF WILDLIFE

6980 Sierra Center Parkway, Suite 120
Reno, Nevada 89511
(775) 688-1500 • Fax (775) 688-1595

TONY WASLEY
Director

LIZ O'BRIEN
Deputy Director

JACK ROBB
Deputy Director

7/31/2017

Adam Green
Sandstone Solar Energy, LLC
520 Broadway, 6th Floor
Santa Monica, CA 90401
adam.green@solarreserve.com
(310) 315-2272

Re: Sandstone Solar Energy Project

Mr. Green:

On behalf of the Nevada Department of Wildlife (NDOW), I am writing to acknowledge receipt of application and payment for the energy review program established under NRS 701.600-701.640. Below is a table of our estimated costs incurred for project review for the Sandstone Solar Energy Project in Nye County, NV. If we require anything additional to accomplish wildlife impact review tasks we will be in contact.

Brad Hardenbrook is the Southern Region Supervisor in the Habitat Division who will be your point of contact for the review activities. You can reach him directly by phone at (702) 486-5127 ext. 3600 or by email at bhrdnbrk@ndow.org.

Sincerely,

A handwritten signature in cursive script that reads "Jasmine C. Kleiber".

Jasmine C. Kleiber
Wildlife Staff Specialist
Habitat Division

cc: Brad Hardenbrook, Southern Region Habitat Supervisor
Linda M. Bullen, Bullen Law, LLC
Suzanne Linfante, Nevada Governor's Office of Energy

Estimated costs for NDOW technical review for the Sandstone Solar Energy Project.

NDOW staff role	Activities	Hours	Hourly rate (average)	Estimated cost
Wildlife Staff Specialist, Habitat Division, Technical Review Lead	Review application, update reporting database, incorporate activity into annual report, produce correspondence for proponent, review mapping activities, coordinate with regional and other staff, manage review timelines, coordinate with external agencies, track budget	21	\$57.29	\$1,203.09
GIS Staff Specialist	Produce map products from project description and footprint; produce correspondence to proponent on maps.	8	\$57.29	\$458.32
Regional Biologists (Habitat, Game, Diversity, Fisheries)	Provide project specific input, coordinate with field staff to gather additional input, assess baseline data, develop monitoring and assessment protocol, manage monitoring and assessment protocol	21	\$54.95	\$1,153.95
Field Biologists (Habitat, Game, Diversity, Fisheries)	Provide project specific input, coordinate with regional staff to provide baseline data and additional input, implement monitoring and assessment protocol, report on monitoring and assessment activities	135	\$50.67	\$6,840.45
Admin Assistant	Receive and transmit deposit, forward proponent paperwork	1.75	\$37.20	\$65.10
Fiscal Officer	Manage finances, produce annual budget reporting	5	\$59.69	\$298.45
Total				\$10,019.36

BULLEN LAW, LLC

3635 W. SAHARA AVE. LAS VEGAS, NV 89117 702.279.4010

July 27, 2017

Nevada Department of Wildlife
Habitat Division
6980 Sierra Center Parkway, Suite 120
Reno, NV 89511 USA
Attn: Jasmine Kleiber

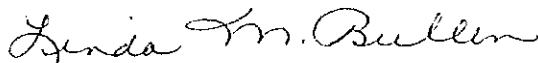
Re: Sandstone Solar Energy, LLC - AB 307 Application for Energy Projects Fund for
Recovery of Costs

Dear Ms. Kleiber:

Please find included herewith the AB 307 Application of Energy Project - Fund for the Recovery of Costs and check for \$10,000.00 submitted on behalf of Sandstone Solar Energy, LLC for the proposed Sandstone Solar Energy Project located in Nye County, Nevada. Please confirm your receipt of this application to the undersigned and let me know if you have any questions regarding this submittal.

Thank you in advance for your time and consideration.

Best Regards,



Linda M. Bullen
Attorney for Sandstone Solar Energy, LLC



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

Nevada Revised Statutes 701.600-640
Nevada Administrative Code 701.800-820

Applicant:
<input type="checkbox"/> Self
<input checked="" type="checkbox"/> Private Company
<input type="checkbox"/> Government Agency
<input type="checkbox"/> Other _____

Project Name Sandstone Solar Energy Project
 Applicant Sandstone Solar Energy, LLC
 Mailing Address 520 Broadway, 6th Floor
 City Santa Monica State CA Zip Code 90401
 Name of Contact Adam Green Phone 310.315.2272 Email adam.green@solarreserve.com
 Name of Responsible Corporate Officer/Agency Rep. Tom Georgis Title Vice President

Project Type

Solar Wind Geothermal Fossil Fuel Biomass Fuel Pipeline Power Transmission
 Net Maximum Generation Capacity 1,600 MW Estimated Voltage (power transmission) 500 kV
 Proposed Project Size (acres) Approx. 20,000 Acres Proposed Transmission Length (miles) _____
 Proposed Length of Fuel Lines/Pipelines (miles) N/A
 Other Infrastructure (e.g., evaporation/holding ponds or tanks, recharge stations; estimated acres) Potential for up to 24 evaporation ponds at 10 acres each (240 acres total).

Proposed County Location (also attach project map) Nye County. Map attached hereto.

Project Description Up to 8 x 200 MW concentrating solar power (CSP) tower projects with integrated molten salt storage on BLM-managed land w/ access to State Highway 89. Each CSP project will consist of a field (approx. 1 mile radius) of dual-axis heliostats, a central receiver tower, a power block which includes a steam turbine/generator, cooling system, water treatment plant, etc. and associated access roads/infrastructure.

Estimated Project Schedule/Timeline Estimated construction start in Q1 of 2022. Each project would likely be constructed within a 24 month construction cycle, staggered 6 months from commencement. Therefore, the total duration of construction and commissioning is expected to be 5.5 years.

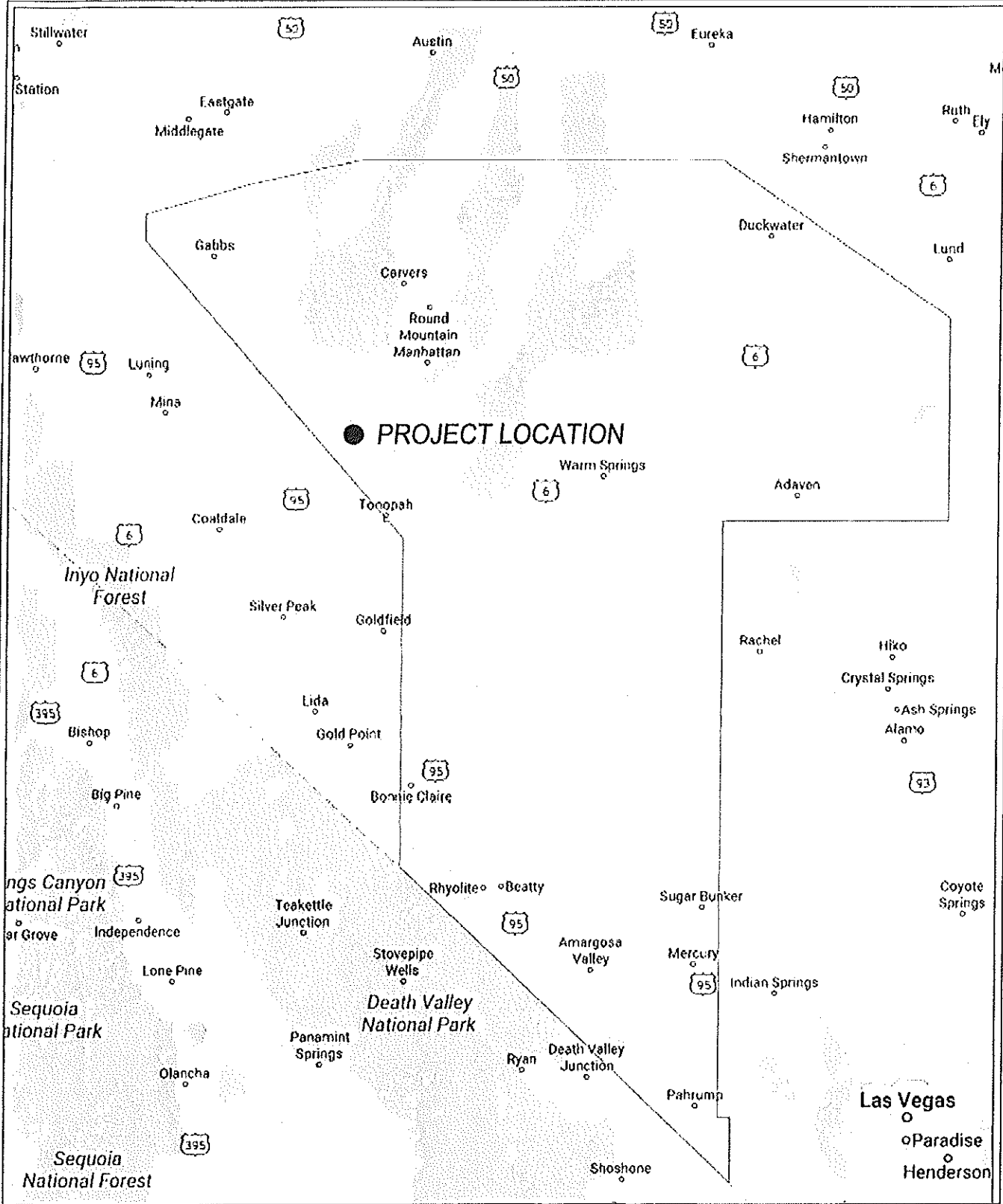
Note that this schedule is approximate, and subject to change based upon permitting/construction timelines.

Applicant Signature *T. Georgis* Date 7/25/17

Enclose initial payment made out to Nevada Department of Wildlife.

- Remit \$5,000 for fuel pipelines less than 50 miles in length, power transmission projects greater than 50kV and less than 50 miles in length, or geothermal production projects.
- Remit \$10,000 for fuel pipelines more than 50 miles in length, power transmission projects greater than 50kV and more than 50 miles in length, or solar, wind, fossil fuel or other energy production projects.

Submit payment with application and maps to: Nevada Department of Wildlife
 Habitat Division
 6980 Sierra Center Parkway, Suite 120
 Reno, NV 89511 USA



SANDSTONE SOLAR ENERGY PROJECT
 SANDSTONE SOLAR ENERGY, LLC
 PROPOSED SITE LOCATION
 NYE COUNTY, NEVADA

DATE: JULY, 2017
 SHEET 1 OF 1
 SCALE: 1" = 150,000'

8053

SOLARRESERVE LLC

520 BROADWAY, FLOOR 6
SANTA MONICA, CA 90401
866-622-2778

JPMORGAN CHASE BANK, N.A.
WWW.CHASE.COM
19-7076/3250

7/20/2017

PAY TO THE ORDER OF **Nevada Department of Wildlife**

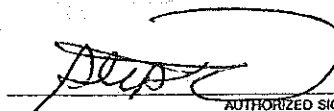
\$ \$ 10,000.00

Ten Thousand Dollars And 00 Cents

DOLLARS

Nevada Department of Wildlife
6980 Sierra Center Parkway, Suite 120
Reno NV 89511

MEMO Sandstone Units 1-8



AUTHORIZED SIGNATURE

⑈008053⑈ ⑆325070760⑆

817312747⑈

SOLARRESERVE LLC

8053

Vendor ID	Name	Payment Number	Check Date	Check Number	
NEV003	Nevada Department of Wildlife	PMT0011595	7/20/2017	8053	
Document Number	Date	Amount	Amount Paid	Discount	Net Amount Paid
SANDSTONE UNITS 1-	7/19/2017	\$ 10,000.00	\$ 10,000.00	\$ 0.00	\$ 10,000.00

\$ 10,000.00

\$ 10,000.00

\$ 0.00

\$ 10,000.00