



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 08-08-009
(Filed August 21, 2008)

**SIERRA PACIFIC POWER COMPANY (U 903 E)
RENEWABLE PORTFOLIO STANDARD 2011 SUPPLEMENTAL FILING**

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August 2, 2010

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Pursuant to California Public Utilities Commission (“Commission”) Decision (“D.”) 08-05-029, *Decision on Participation of Small and Multi-Jurisdictional Utilities in the Renewables Portfolio Standard Program*, Sierra Pacific Power Company (“Sierra”) hereby respectfully submits its 2011 RPS Supplemental Filing (“Supplement”) to its 2010 Integrated Resource Plan (“IRP”).¹ Additionally, Sierra renews its request that the Commission set July 15 as the filing date for supplemental filings in years that an IRP is not filed to provide a standardized submission time that better coincides with Sierra’s existing resource planning processes.²

I. Introduction

Along with Sierra’s 2010 IRP, this Supplement serves to provide additional data about Sierra’s plans to comply with California’s Renewables Portfolio Standard (“RPS”). It also serves to inform the Commission that Sierra has no significant changes from its 2010 Supplement or prior RPS filings. Sierra continues to be on track to meet its California RPS obligation. There are no changes to Sierra’s plans as described in its 2010 Supplement to meet RPS obligations. Sierra will continue to use the same renewable resources described in prior filings to satisfy its California RPS requirements. Although Sierra is fully resourced and is not

¹ Sierra filed its 2010 IRP with the Public Utilities Commission of Nevada on July 1, 2010. D.08-05-029 requires multi-jurisdictional utilities to submit RPS Supplemental Filings within 30 days of filing the IRP in another jurisdiction. (See D.08-05-029, App. A.) Accordingly, this Supplement is timely filed.

² See Sierra’s 2010 RPS Supplemental Filing, filed on December 18, 2009, pp. 1-3.

proposing any significant changes, Sierra is including minor updates to the forecast data presented in the 2010 Supplement as Appendix A. Additional details about Sierra's specific renewable procurement is provided in a copy of Sierra's most recent RPS Compliance Report, submitted to the Commission on July 28, 2010, as Appendix B to this Supplement.

II. 2011 Supplement

A. RPS Procurement

Sierra is currently in compliance with its California RPS procurement obligations and expects to remain in compliance. This is reflected in Sierra's most recent August 2010 RPS Compliance Report, submitted on July 28, 2010. Sierra's August 2010 RPS Compliance Report is attached as Appendix B. Sierra is currently sufficiently resourced to meet its 20% RPS procurement obligation. As a multi-jurisdictional utility, Sierra undertakes its RPS procurement in a manner intended to achieve compliance with requirements imposed by both Nevada and California. California RPS-eligible resources are then allocated to California to comport with the specific annual procurement requirements, which are expected to be a declining proportion of the overall system requirement as Sierra's Nevada loads grow over time. While Sierra has used flexible compliance in the past to meet annual procurement targets, it is now fully resourced and does not anticipate needing to use flexible compliance to meet any future procurement obligations.

B. Program Metrics

Data and information for each year from 2003 through 2020 are included in Sierra's August 2010 RPS Compliance Report included in Appendix B. This includes retail sales data and forecasts, annual procurement targets, RPS-eligible procurement data, flexible compliance data, and other data.

C. Transmission Issues

Sierra is the Balancing Authority that owns and operates the transmission system within its control area, consistent with Western Electricity Coordinating Council and North American Electric Reliability Council protocols. Sierra's operations are outside of the control area of the California Independent System Operator. Because Sierra operates its own control area, available transmission and flexible delivery are not compliance concerns.

D. Bid Evaluation

Sierra has no solicitations pending or scheduled specific just to the California RPS requirement. As previously noted, Sierra is fully resourced with respect to complying with California RPS requirements. Sierra issues requests for proposals ("RFPs") pursuant to its efforts to comply with its Nevada-based procurement requirements, consistent with its IRP and RPS program requirements. RFPs are issued based on anticipated system needs in Nevada and will secure cost effective resources. For renewable energy, specific renewable RFPs are issued as necessary to meet resource planning requirements.

E. Resource Planning

As a multi-jurisdictional utility, Sierra is in a unique situation that differs significantly from the larger investor owned utilities ("Large IOUs"). Specifically, Sierra is a Nevada corporation providing electric utility services subject to the requirements of three jurisdictions: Nevada, California, and the Federal Energy Regulatory Commission ("FERC"). Sierra also provides gas utility services to the Reno and Sparks areas of Nevada. Sierra operates a single electrical system with a combined count of approximately 367,000 customers in both states, but with approximately 46,000 customers located in the Lake Tahoe area of California. The vast majority of Sierra's service territory and retail customers are located in Nevada. Sierra's multi-state peak load in the summer was approximately 1,554 megawatts ("MWs") in 2009, and a

preliminary 2010 peak of 1,611 MWs. Its total 2009 retail system energy sales were 8,162,000 megawatt hours (“MWh”), with 37.1% of its energy requirements provided through purchased power. Sierra’s projected California sales represent a little over six percent (6.7%) of total sales, or approximately 542,915 MWhs for 2010, reflecting a maximum California peak demand of 65 MWs in 2009, with a similar forecast for 2010.

In relation to California sales made by other jurisdictional utilities, Sierra’s California sales comprise a small proportion of total sales. Based on allocations among electric investor owned utilities (“IOUs”) in California as established by the Energy Division in Rulemaking (“R.”) 07-09-008, Sierra’s California sales account for 0.28% of the total jurisdictional California system sales on a MWh basis. Comparatively, the three Large IOUs, Southern California Edison, Pacific Gas and Electric Company, and San Diego Gas and Electric Company, account for 99.20% of the total jurisdictional California system sales on a MWh basis. Stated differently, on a sales basis, SCE has over 162 times as much in sales, PG&E has over 158 times as much in sales, and SDG&E has over 37 times as much in sales in California than Sierra. Based on the vast differences in size and service territories, the Commission has historically recognized that regulatory requirements for the Large IOUs should not always extend to the smaller or multi-jurisdictional utilities such as Sierra. This is true for Progress Development Status Reports as well as AMFs. The Commission has historically deferred to Nevada’s extensive regulatory oversight over Sierra’s resource planning efforts (exemplified through its IRP processes)³ and has historically approved ratemaking mechanisms that reflect an appropriate allocation of costs between jurisdictions. Furthermore, as demonstrated in its August 2010 RPS Compliance Report, Sierra’s efforts have put it in the fortunate position of full compliance with its current and forecast 20% RPS procurement requirements and no additional resource planning

³ See, D.04-02-044 (February 2004).

or procurement for California requirements is necessary. Moreover, the allocation of RPS eligible resource output—as opposed to dedication of output from specific projects—provides an additional benefit to California ratepayers in terms of avoiding assumption of certain project operational risks.

F. Changes in IRP

Between 2007 and 2010, Sierra’s California and Nevada renewable procurement requirements both increased pursuant to each state’s respective renewable portfolio standard. Sierra’s plan for, and its acquisition of, renewable resources accordingly increased between the 2007 IRP and the 2010 IRP. Additionally, the 2010 IRP addresses the company’s plan to transfer control of its California service territory, which is currently pending before the Commissions of both states.⁴

G. Conformance with Public Utilities Code Section 399.17(d)

According to Public Utilities Code Section 399.17(d):

An electrical corporation with 60,000 or fewer customer accounts in California that serves retail end-use customers outside California, may use an integrated resource plan prepared in compliance with the requirements of another state utility regulatory commission, to fulfill the requirement to prepare a renewable energy procurement plan pursuant to this article, provided the plan meets the requirements of Sections 399.11, 399.12, 399.13, and 399.14, as modified by this section.

⁴ See, Joint Application of Sierra Pacific Power Company (U903E) and California Pacific Electric Company, LLC for Transfer of Control and Additional Requests Relating to Proposed Transaction, Application 09-10-028, filed October 16, 2009, available at <http://docs.cpuc.ca.gov/published/proceedings/A0910028.htm>; see also the Application of Sierra Pacific Power Company d/b/a NV Energy for approval of disposition of Kings Beach Generation Facility and additional requests relating to proposed transaction, filed at the Public Utilities Commission of Nevada on December 2, 2009, docket number 09-12002. The transaction and related contracts contemplated in the above applications must be approved by state regulatory authorities and the FERC.

Sierra's IRP and this Supplement sufficiently satisfy the relevant requirements of Sections 399.11, 399.12, 399.13, and 399.14.⁵ Accordingly, the IRP and Supplement conform with the requirements in Section 399.17(d) of the Public Utilities Code.

III. Request for Date Certain for Future Supplemental Filings

Consistent with D.08-05-029,⁶ Sierra requests a modification to the current annual supplemental filings process. In order to provide a definitive filing date and avoid regulatory uncertainty, Sierra proposes a modification to set a date certain for the annual supplemental submission deadline. Currently, for years when an IRP is not filed, Sierra is required to file its annual supplemental filing at the "same time as large IOUs file [their annual] procurement plans."⁷ Since the requirements for supplemental filings filed by multi-jurisdictional utilities like Sierra differ from the requirements for the annual procurement plans filed by the three largest investor-owned utilities, there is no need for the filing dates to be identical. In fact, D.08-05-029 explicitly "authorize[s] the assigned ALJ or assigned Commissioner in R.06-05-027 or its successor proceeding to vary the requirements for the content or filing date of the annual supplements for years when an IRP is not filed."⁸ Accordingly, Sierra asks that the Commission

⁵ For example, § 399.14(a)(3) requires renewable energy procurement plans to include the following:

- (A) An assessment of an annual or multiyear portfolio supplies and demand to determine the optimal mix of eligible renewable energy resources with deliverability characteristics that may include peaking, dispatchable, baseload, firm, and as-available capacity.
- (B) Provisions for employing available compliance flexibility mechanisms established by the commission.
- (C) A bid solicitation setting forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any.

Between the IRP and this Supplement, all of these issues have been addressed. Other relevant issues and requirements from the Public Utilities Code have similarly been satisfied. Accordingly, Sierra has complied with Section 399.17(d).

⁶ D.08-05-029, p. 28 and Ordering Paragraph 10.

⁷ D.08-05-029, Appendix A.

⁸ D.08-05-029, p. 28.

exercise this authority to establish a date certain for Sierra's supplemental filings in years that an IRP is not filed.

Providing a fixed filing date for supplemental filings will help Sierra meet regulatory deadlines, reduce administrative burdens and help ensure that the Commission receives accurate and current information in a timely manner. Rather than awaiting a Commission determination assigning a filing date in light of developments with the large IOU RPS planning process, which did not occur until November 2, 2009 for last year's filing and has yet to be issued for this year's filing, Sierra believes it would be more beneficial to provide a date certain for future filings. This way, Sierra will know at the beginning of the year when it will need to submit its supplemental filing and can plan accordingly. Sierra recommends that in years that an IRP is not filed, it be required to submit its supplemental filing on July 15. This date provides sufficient lead time to ensure that any changes to Sierra's resource planning, including its RPS planning, will be reflected in the filing. Using a July 15 date will dovetail well with filing dates applicable to submissions made at the Public Utilities Commission of Nevada and will ensure that the Commission receives up to date and relevant data regarding Sierra's RPS plans.

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Appendix A

Minor Updates to Sierra Pacific Power Company's 2010 Supplement

In its 2010 Supplement, Sierra provided forecast data on peak loads and energy sales.

According to the 2010 Supplement:

For 2009 the actual system peak for Sierra was 1,554 MW. Its forecasted 2010 total system peak is expected to be 1,572 MW. The maximum summer load in the California retail portion of Sierra's System Control Area was approximately 65 MW for 2009 and is expected to be approximately 67 MW in 2010. The winter peak load for 2009 for Sierra was 1,347 MW on December 9, 2009 at 7 p.m. The forecast 2009 California retail energy sales were 535,183 MWh. Forecast 2010 California retail energy sales are expected to be approximately 537,218 MWh, or a little over six percent (6%) of total forecast 2010 system sales. (Sierra Pacific Power Company 2010 Supplement, App. A.)

The forecast data has changed since the time that Sierra submitted its 2010 Supplement. The expected 2010 total system peak was 1,578 MW (per the July 1, 2010 IRP forecast), but an actual peak of 1,611 MW occurred on July 15, 2010 at 5 p.m. The maximum summer load for 2010 is expected to be approximately 65 MW also. The actual 2009 California retail energy sales were 541,537 MWh. 2010 California retail energy sales are expected to be approximately 542,915 MWh, or a little over six percent (6%) of total forecast 2010 system sales. Sierra's future RPS Compliance Reports will reflect the then-current data.

Appendix B

Sierra Pacific Power Company's August 2010 RPS Compliance Report

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Rulemaking 08-08-009
(Filed August 21, 2008)

Sierra Pacific Power Company

**August 2010 SEMI-ANNUAL COMPLIANCE REPORT
PURSUANT TO THE CALIFORNIA RENEWABLES
PORTFOLIO STANDARD**

28-Jul-10

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CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

Reporting and Compliance Worksheet Instructions

1. California's RPS Program requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), Electric Service Providers (ESP), and Community Choice Aggregators (CCAs) to file a minimum of two reports each year illustrating performance within the program. Parties may refer to the November 20, 2008 Assigned Commissioner Ruling Addressing Process Issues Relative to RPS Compliance Reports for more information.
 - > The March 1 report (with updates after the California Energy Commission (CEC) verifies procurement, as needed) is used by the Commission to determine compliance for the prior year(s). This report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement data for at least three years (Decision (D.) 06-10-050, page 45, 49).
 - > The August 1 report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement levels for each year forward through 2020 (D.06-10-050, page 45, 51). The August report may be used by the Commission to make a final determination of compliance for the prior year(s).
2. Any load serving entity (LSE) seeking confidentiality protection should file a declaration. Confidentiality requests shall comply with the substantive and procedural rules set forth in D.06-06-066, as modified by D.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for confidentiality should include the identification of all redacted information by tab name and cell reference, not to be confused with the line numbers provided in the Accounting tab.
3. RPS compliance reports will be submitted to the Commission as specified below:
 - > Serve a public version on the service list in proceeding R.08-08-009. All pages must be legible. LSEs are responsible for maintaining confidentiality when serving a redacted report.
 - > File a confidential version with the Energy Division by e-mailing an electronic version to ab1@cpuc.ca.gov and svn@cpuc.ca.gov
 - > Send paper copies (confidential and public) to each of the assigned Administrative Law Judges (ALJs):

Burton W. Mattson and Anne E. Simon
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
4. Any questions regarding the completion and/or filing of this report can be directed to:
Amy Baker, Energy Division, California Public Utilities Commission: ab1@cpuc.ca.gov, (415) 703-1691
5. Include the Title Page and fill out the following information:
 - > Name of the LSE filing the Report
 - > Date the Report is being filed
 - > Contact information
6. Complete the Officer Verification Form in the format provided (Rule 1.11)
7. Yellow cells throughout the spreadsheet indicate user supplied data by the LSE where and when applicable.
8. All data must be entered in MWh out to three decimal points to accurately account for retail sales, procurement and targets. The spreadsheet will display MWh throughout. Do not round any reporting data, as this may trigger some cells to turn red.
9. The spreadsheet included in this report has locked cells to ensure that targets, procurement and penalties are accurately calculated and reported from the data provided by the user. An unprotected version of the spreadsheet is also available by request.
10. Line #'s in the "Accounting" tab hyperlink to the "Calculations" tab, which provides additional information on the particular line item or section of the "Accounting" tab.

SUMMARY TAB

11. The "Summary" tab is linked to the "Accounting" tab and "Procurement Detail" tab, no data entry is required.
12. If the LSE determines that additional information is required in order to present a full and complete report, mark the box provided on the "Summary" tab. Any additional information should support the LSE's claim within the guidelines of the eight allowable reasons for noncompliance. Furthermore, please state anything else the filing LSE believes is necessary for a full and complete reporting to the Commission in order to allow an informed decision on compliance. This may include, for example, footnotes and other explanatory information as necessary and reasonable.

ACCOUNTING TAB

13. Begin by entering the relevant data for Lines 1-3, this will calculate the LSE's Baseline Procurement Amount. Enter actual and forecasted sales figures to generate Incremental Procurement Targets (IPTs) and Annual Procurement Targets (APTs).

14. In deficit years, the spreadsheet calculates what portion of the deficit is eligible for IPT deferral and earmarking. The user records how they elect to treat the deficit(s) in the relevant sections, including using surplus procurement. The spreadsheet calculates the allowable IPT deferral and Earmarking amount through 2020.

EARMARKING DETAIL TAB

15. Enter information for contracts that are eligible for earmarking and are being used for flexible compliance purposes. Data populates the earmarking section in the "Accounting" tab. LSEs should include power purchase agreements used for earmarking with their compliance filings, so Energy Division may verify eligibility. If the LSE has provided the power purchase agreement in a prior report or filing, it does not need to be provided again.

PROCUREMENT DETAIL TAB

16. Procurement Summary: Total RPS Eligible Procurement is differentiated by three categories, *existing and or signed contracts*, *short-listed/under negotiation/pending approval*, and *generic future contracts*. This section is populated by completing the Contract Detail section below. If the LSE has entered into contracts that are short-term or with existing facilities but cannot meet its Annual Minimum Contracting Requirement, then deliveries from those contracts may not be used for compliance in any year (D.07-05-028).

> *Annual Contracting Quota Requirement*: LSEs must enter into long-term contracts or contracts with new facilities for energy deliveries equivalent to at least 0.25% of that LSE's prior years' retail sales, if it intends to use deliveries from short-term contracts and/or existing facilities, for RPS compliance purposes. LSEs must submit supporting documentation proving that the requirement has been met (i.e. a power purchase agreement for a long-term and/or new contract). If the LSE has provided the power purchase agreement in a prior report or filing, it does not need to be provided again.

- Contracts are differentiated by Contract term-length and type (row 15:16). All deliveries from "long-term and/or new" are automatically entered into "Cumulative Surplus Contracting Quota Bank" (row 19) and the user must input the MWh in row 18 that the LSE needs to comply with the Annual Contracting Quota Requirement, if necessary.

17. RPS Eligible Procurement by Resource Type: This report must state the amount procured or projected to be procured from each resource type (D.05-07-039, Appendix A, D.06-10-050, page 47-48). This information is reported in rows 25-38 in the "Procurement Detail" tab and populated by completing the "Contract Detail" section.

18. Contract Detail: For each contract, enter actual and forecasted delivery data throughout the contract term. Do not assume that an expiring contract will be renegotiated.

> *Pre-2002 Contracts*: Input total annual deliveries by resource type

> *2002-Present years' Contracts*: List contracts by name, annual deliveries (MWh), project status, facility status and resource type.

> *2005-Present years' Contracts*: In addition to the requirements above, contracts from these years should be identified by term-length, short-term (less than 10 years) and long-term, as well as, by type, existing or new (defined below). 2005 and 2006 contracts that were signed prior to 2007 can be identified as "n/a" for this purpose.

- *"Contract Length / Type"* (Column "X") Pursuant to D.07-05-028, starting in 2007, each RPS-obligated LSE must, in order to be able to count for any RPS compliance purpose energy deliveries from contracts of less than 10 years' duration ("short-term") with RPS-eligible facilities that commenced commercial operation prior to January 1, 2005 ("existing facilities"), in each calendar year enter into contracts with facilities of at least 10 years' duration ("long-term") and/or short-term contracts with facilities that commenced commercial operation on or after January 1, 2005 ("new facilities") for energy deliveries equivalent to at least 0.25% of that LSE's prior year's retail sales ("minimum quantity").

- *"Contract Volume"* (Column "Y") Input the total MWh over the term of the contract identified in the power purchase agreement. Compliance with the minimum quota requirement is measured by contracted-for-energy, not deliveries.

> *"Generic Future Contracts"*: Input total forecasted annual deliveries by resource type

> *"Expired Contracts"*: Any contract expiring prior to 2020 should be listed in this section. User should identify expired contract by name and input annual deliveries (MWh) in the first year the contract is no longer delivering for the LSE (per existing contract) and in every year thereafter. For example, if a contract with annual deliveries of 10,000 MWh expired 12/31/2007, user should enter 10,000 MWh in 2008 and in every year thereafter. If this same contract expired 6/30/2007, user should enter 5,000 MWh in 2007 and 10,000 in every year thereafter. If an expired or expiring contract is re-signed, remove contract information from "Expired Contracts" section and enter it under the appropriate contracting year, as you would for any other contract.

19. In the "Contract Status" column, "short-listed and/or under negotiation" is an option; use the short-listed option only for projects for which the LSE has a high level of confidence that a contract will be executed.

20. If any procurement data for a specific contract differs from what is entered into the CEC-RPS-Track form for that year, the specific cell should be highlighted and the discrepancy should be explained.

Spreadsheet user notes

> Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell - click on "fill color" icon - choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.

> Adding and/or deleting rows. The "Earmarking Detail" tab and "Procurement Detail" tab allows users to add to or delete rows.

RPS Compliance Report: Summary

Sierra Pacific Power Company	2007
28-Jul-10	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	542,589	
Annual Procurement Target (APT)	75,142	13.8%
Total RPS Eligible Procurement	48,833	9.0%
Annual Procurement Surplus/(Deficit)	(26,309)	
Adjusted Procurement Percentage*		12.9%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	5,147	10.5%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	5,147	10.5%
Geothermal	38,040	77.9%
Small Hydro	3,776	7.7%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	1,870	3.8%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	48,833	100.0%

Flexible Compliance	MWh
IPT Deferral	21,209
Earmarking	5,100
Banked Procurement Applied	0
Total Flexible Compliance	26,309

Deficits and Penalties	2007
Preliminary Procurement (Deficit)	(26,309)
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

RPS Compliance Report: Summary

Sierra Pacific Power Company	2008
28-Jul-10	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	544,410	
Annual Procurement Target (APT)	80,586	14.8%
Total RPS Eligible Procurement	85,685	15.7%
Annual Procurement Surplus/(Deficit)	5,100	
Adjusted Procurement Percentage*		15.7%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	6,544	7.6%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	6,544	7.6%
Geothermal	71,650	83.6%
Small Hydro	3,625	4.2%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	3,867	4.5%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	85,685	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2008
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferr

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

RPS Compliance Report: Summary

Sierra Pacific Power Company	2009
28-Jul-10	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	535,273	
Annual Procurement Target (APT)	85,938	16.1%
Total RPS Eligible Procurement	117,346	21.9%
Annual Procurement Surplus/(Deficit)	31,408	
Adjusted Procurement Percentage*		18.0%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	0	0.0%
Geothermal	117,346	100.0%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	117,346	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2009
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferr

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

RPS Compliance Report: Accounting

Sierra Pacific Power Company
28-Jul-10

Line#	RPS Baseline Calculation	(MWh)
1	2001 Total System Retail Sales	8,741,136
1a	2001 Total California Retail Sales	505,625
2	2001 System RPS-Eligible Procurement	818,596
3	2003 Total California Retail Sales	521,912
4	2003 Baseline Procurement Amount	53,933

	Input Required
	Forecasted Data
	Actual Data

		Actual											
RPS Procurement and Targets (MWh)		2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
5	Bundled Retail Sales	521,912	527,784	528,618	542,589	544,410	535,273	541,537	542,915	539,989	537,574	536,548	536,592
6	Total RPS Eligible Procurement	0	0	0	0	48,833	85,685	117,346	108,583	107,998	107,515	107,310	107,318
7	Annual Procurement Target (APT)	53,933	N/A	N/A	N/A	75,142	80,586	85,938	108,583	107,998	107,515	107,310	107,318
8	Incremental Procurement Target (IPT)	N/A	5,219	5,278	5,286	5,426	5,444	5,353	22,644	0	0	0	9
9	Preliminary Procurement Surplus/(Deficit)	N/A	N/A	N/A	N/A	(26,309)	5,100	31,408	0	(0)	(0)	0	(0)
10	APT Percentage	N/A	N/A	N/A	N/A	13.8%	14.8%	16.1%	20.0%	20.0%	20.0%	20.0%	20.0%
11	Actual Procurement Percentage	0.0%	0.0%	0.0%	0.0%	9.0%	15.7%	21.9%	20.0%	20.0%	20.0%	20.0%	20.0%
12	Adjusted Procurement Percentage*	N/A	N/A	N/A	N/A	12.9%	15.7%	18.0%	20.0%	20.0%	20.0%	20.0%	20.0%

		Actual											
Flexible Compliance - IPT Deferral		2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
13	Maximum Deficit Eligible for Deferral	N/A	N/A	N/A	N/A	21,209	0	0	0	0	0	0	0
14	Deficit being Carried Forward to Year + 1	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0
15	Deficit being Carried Forward to Year + 2	N/A	N/A	N/A	N/A	21,209	0	0	0	0	0	0	0
16	Deficit being Carried Forward to Year + 3	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0
17	Total Current Year Deficit Carried Forward	N/A	N/A	N/A	N/A	21,209	0	0	0	0	0	0	0
18	Remaining Deficit from Year - 1 to Be Filled in Current Year	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
19	Remaining Deficit from Year - 2 to Be Filled in Current Year	N/A	N/A	N/A	N/A	N/A	N/A	(21,209)	0	0	0	0	0
20	Remaining Deficit from Year - 3 to Be Filled in Current Year	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0
21	Total Prior Year Deficits That Must Be Filled This Year	N/A	N/A	N/A	0	0	0	(21,209)	0	0	0	0	0
22	Current Year Surplus Procurement Applied to Year - 1 Deficit	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0
23	Current Year Surplus Procurement Applied to Year - 2 Deficit	N/A	N/A	N/A	N/A	N/A	N/A	21,209	0	0	0	0	0
24	Current Year Surplus Procurement Applied to Year - 3 Deficit	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0
25	Total Deliveries Applied to Prior Year IPT Deficits	N/A	N/A	N/A	N/A	N/A	0	(21,209)	0	0	0	0	0

		Actual											
Flexible Compliance - Earmarking		2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
26	Portion of Current Year Deficit Eligible for Earmarking	N/A	N/A	N/A	N/A	24,952	0	0	0	0	0	0	0
27	Future Deliveries Earmarked from Year + 1	N/A	N/A	N/A	N/A	5,100	0	0	0	0	0	0	0
28	Future Deliveries Earmarked from Year + 2	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0
29	Future Deliveries Earmarked from Year + 3	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0
30	Total Projected Procurement Earmarked to Current Year	N/A	N/A	N/A	N/A	5,100	0	0	0	0	0	0	0
31	Current Year Deliveries Earmarked to Year - 1	N/A	N/A	N/A	N/A	N/A	5,100	0	0	0	0	0	0
32	Current Year Deliveries Earmarked to Year - 2	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0
33	Current Year Deliveries Earmarked to Year - 3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0
34	Total Deliveries Earmarked to Prior Year Earmarked Deficits	N/A	N/A	N/A	N/A	N/A	(5,100)	0	0	0	0	0	0

		Actual											
Surplus Procurement Bank		2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
35	Surplus Procurement Bank Balance as of Prior Year	0	0	0	0	0	0	0	10,199	10,199	10,199	10,199	10,199
36	Application of Banked Surplus Procurement to Current Year Deficit												
37	Adjusted Current Year Annual Surplus Procurement	0	0	0	0	0	0	10,198	0	0	0	0	0
38	Cumulative Surplus Procurement Bank Balance	0	0	0	0	0	0	10,199	10,199	10,199	10,199	10,199	10,199

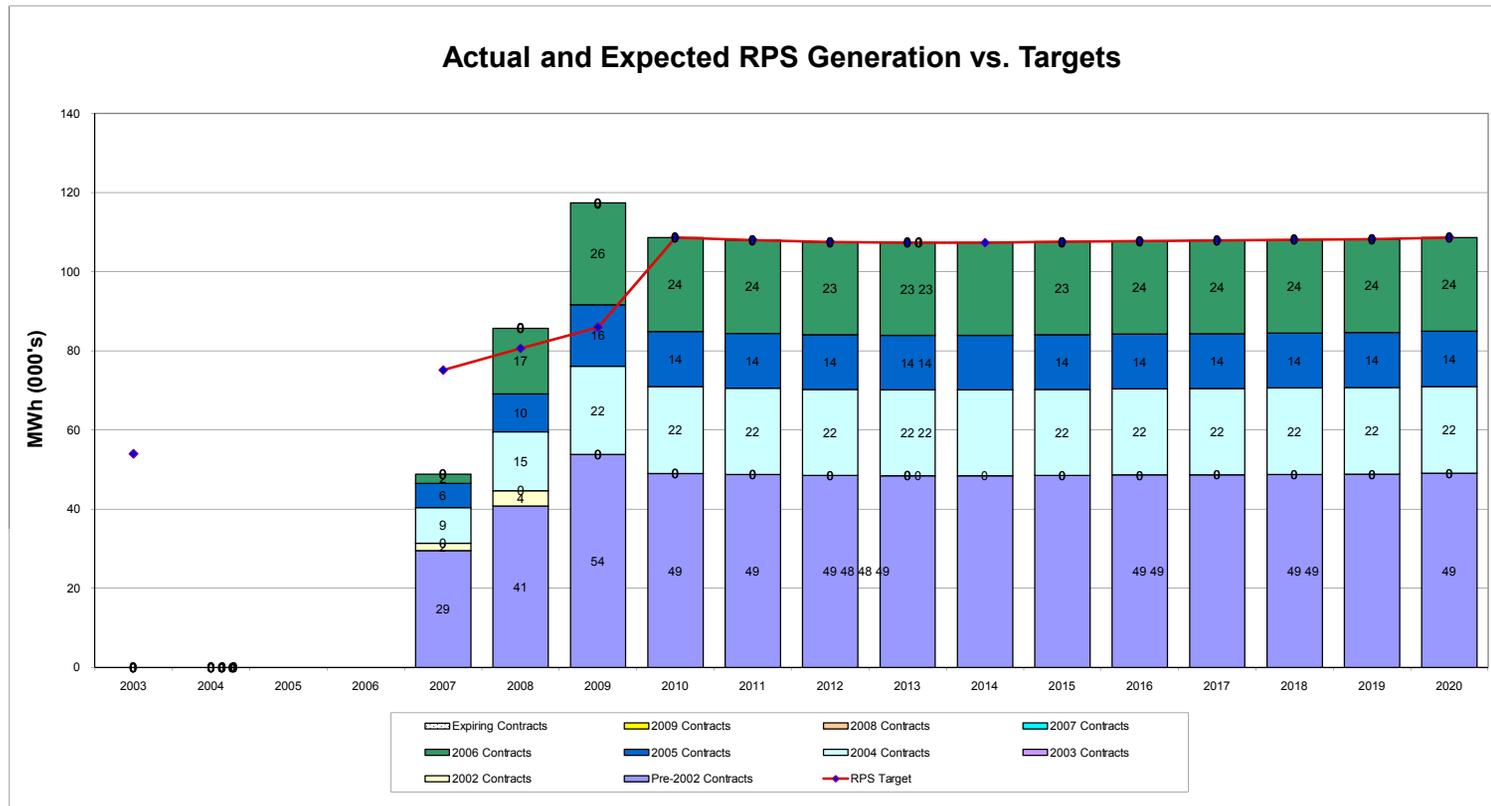
		Actual											
Adjusted Deficit		2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
39	Adjusted Annual Procurement Deficit	N/A	N/A	N/A	N/A	0	0	0	0	(0)	(0)	0	(0)
40	Adjusted Deficit Deferred	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0
41	Potential Penalty	N/A	N/A	N/A	N/A	\$0	\$0	\$0					
42	Current Penalty (with flexible compliance)	N/A	N/A	N/A	N/A	\$0	\$0	\$0					

Potential Penalty may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance

RPS Compliance Report: Performance Chart

Sierra Pacific Power Company
28-Jul-10

RPS Procurement and Targets (MWh)	Actual MWh								Forecast MWh										
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
Total Retail Sales	521,912	527,784	528,618	542,589	544,410	535,273	541,537	542,915	539,989	537,574	536,548	536,592	537,606	538,760	539,504	540,255	541,139	543,143	
Actual RPS Procurement %	0.0%	0.0%	0.0%	0.0%	9.0%	15.7%	21.9%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	
IPT N/A		5,219	5,278	5,286	5,426	5,444	5,353	22,644	0	0	0	9	203	231	149	150	177	401	
APT % (Baseline for 2003)	N/A	N/A	N/A	N/A	13.8%	14.8%	16.1%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	
APT as MWh Amount	N/A	N/A	N/A	N/A	75,142	80,586	85,938	108,583	107,998	107,515	107,310	107,318	107,521	107,752	107,901	108,051	108,228	108,629	
Preliminary Surplus/(Deficit)	N/A	N/A	N/A	N/A	(26,309)	5,100	31,408	0	(0)	(0)	0	(0)	(0)	(0)	(0)	(0)	0	(0)	



RPS Compliance Report: Calculations

RPS Baseline Inputs (MWh)		
Line#	Calculation	Notes
1	User supplied data	Consistent with D.07-03-046, the 2003 Initial Baseline Procurement Amount for the Multi-Jurisdictional investor owned utilities (MJUs) is calculated using the following equation:
1a	User supplied data	step 1 2001 CA sales (MWh) / 2001 System sales (MWh) = 2001 System's CA sales (%)
2	User supplied data	step 2 2001 System's CA sales (%) * 2001 System RPS-eligible procurement (MWh) = 2001 CA RPS-eligible procurement (MWh)
3	User supplied data	step 3 2001 CA RPS-eligible procurement (MWh) / 2001 CA sales (MWh) = 2001 CA RPS-eligible procurement (%)
4	Baseline Calculation	step 4 (2001 CA RPS-eligible procurement (%) * 2003 CA sales) + (1% * 2001 CA sales) = Initial Baseline Procurement Amount (M

RPS Procurement and Targets (MWh)		
Line#	Calculation	Notes
5	User supplied data	Annual Retail Sales
6	Data from "Procurement Detail" tab	In current and past years, this line should equal Total RPS Eligible Procurement in procurement detail tab.
7	Prior year Line 7 + Line 8	2007 APT = Baseline Amount + 2004 IPT + 2005 IPT + 2006 IPT + 2007 IPT (D.08-05-029, page 11)
8	1% of line 5 {Y-1}	
9	Line 6 - Line 7	
10	Line 7 / Line 5 {Y-1}	
11	Line 6 / Line 5 {Y-1}	In 2003, 2003 RPS procurement is divided by 2001 retail sales rather than 2002 retail sales.
12	(Line 6 + Line 17 + Line 25 + Line 30 + Line 34 + Line 36) / Line 5 {Y-1}	RPS procurement percentage after applying flexible compliance, assuming all allowable planned deliveries come online as planned.

Flexible Compliance - IPT Deferral		
Line#	Calculation	Notes
13	Up to 0.25% of Prior Year Retail Sales	In 2007, 100% of the IPT Deferral can be deferred for up to 3 years without explanation.
14-16	User supplied data	
17	Sum of Lines 14:16	Current year deficit carried forward. Warning if cell value is greater than Line 13.
18-20	Record of Lines 14:16	Deferred IPT obligations due in current year.
21	Sum of Lines 18-20	Total deferred IPT obligations due in current year.
22-24	User supplied data	Past year IPT obligations retired with current year surplus procurement. Per accounting rules D. 06-10-050, Attachment A, page 9-10, current year deliveries may only be applied to past year IPT deficits after earmarked deliveries have been subtracted, and after any deliveries needed to meet current year APT have also been subtracted (D.03-06-0711, Conclusion of Law 25).
25	Sum of Lines 22-24	Total current year surplus applied to prior year IPT obligations due in current year.

Flexible Compliance - Earmarking		
Line#	Calculation	Notes
26	Line 9 + Line 13 + Line 34	Portion of current year deficit greater than allowable IPT Deferral
27-29	Data from "Earmarking Detail" tab	User supplied data
30	Sum of Lines 27:29	
31-33	Data from "Earmarking Detail" tab	User supplied data. Current year deliveries may only be applied to past year deficits which have been deferred by earmarking, after current year APT has been met (D.03-06-071), Conclusion of Law 25).
34	Sum of Lines 31:33	Total current year surplus subtracted to meet prior years Earmarking obligations due in current year

Surplus Procurement Bank		
Line#	Calculation	Notes
35	Line 38 {Y-1}	
36	User supplied data	
37	Line 9+ Line 25 + Line 34	Current year surplus procurement less any prior year IPT obligations and/or Earmarking obligations
38	Sum of Lines 35:37	

Adjusted Deficit		
Line#	Calculation	Notes
39	Line 9 + balance of IPT obligations after 3 years + balance of Earmarking obligations after 3 years	In any current year, the adjusted annual procurement deficit is the LSE's annual deficit less any deliveries used to meet IPT or Earmarking obligations for prior years deficits. Any portion of adjusted annual procurement deficit that remains after the following three years is subject to penalty.
40	Balance of IPT obligations after 3 years + balance of Earmarking obligations after 3	In any current year, the adjusted deficit temporarily excused is the sum of IPT deferral and Earmarked deliveries (line 17+ line 30). Any portion of line 40 remaining after 3 years will be reflected in line 39 and subject to penalty.
41	Line 39 * \$50.0	Per accounting rules, LSEs must list penalty based the size of on adjusted annual procurement deficit, even if allowable reasons are being given for why the penalty is not yet due and payable. Penalties are assessed at \$0.05/kWh deficit.
42	(Line 39 + 40) * \$50.0	LSE's have the opportunity to make up annual procurement deficits through existing flexible compliance rules. Accordingly, if an LSE has a deficit in year 1, and is able to fully exercise flexible compliance mechanisms, the penalty for year 1 compliance may not apply.

ATTORNEY VERIFICATION FORM

I am an attorney for Sierra Pacific Power Company ("SPPC"), the submitting entity. An officer of SPPC is absent from the County of Sacramento, California, where I have my office and I make this verification for said submission on behalf of SPPC for that reason. The statements in the foregoing document are true of my own knowledge, except as to matters which are stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 2010 at Sacramento, California.



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**NOTICE OF AVAILABILITY
OF INTEGRATED RESOURCE PLAN**

The Integrated Resource Plan (“IRP”) of Sierra Pacific Power Company (“Sierra”) is available to all interested parties and to the public. Pursuant to Commission Rule 11.6, on July 30, 2010 Administrative Law Judge Mattson granted by telephone Sierra’s oral motion to late-file its IRP. Consistent with Rule 1.9 of the Commission’s Rules of Practice and Procedure, Sierra is issuing this Notice of Availability. Sierra’s IRP exceeds 50 pages in length, and totals in size about 114 MB. This Notice of Availability is being served on all parties of record in R.08-08-009. Sierra’s IRP may be viewed and downloaded at the following URL: <http://www.nvenergy.com/company/rates/filings/index.cfm>. The IRP is available at this URL as of today.

Verification

I am the attorney for the respondent corporation herein; said respondent corporation is absent from the County of Sacramento, California, where I have my office, and I make this verification for said respondent corporation for that reason. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2010 at Sacramento, California.

Jedediah

/s/

J. Gibson, Attorney

Certificate of Service

I hereby certify that I have this day served a copy of “Sierra Pacific Power Company (U 903 E) Renewable Portfolio Standard 2011 Supplemental Filing” on all known parties to R.08-08-009 by transmitting an e-mail message with the document attached to each party named in the official service list. Parties without a valid e-mail address were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on August 2, 2010 at Sacramento, California

_____/s/_____

Eric Janssen

R.08-08-009
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August 2, 2010

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