



**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 2010 SUPPLEMENTAL FILING**

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December 18, 2009

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Pursuant to the *Amended Scoping Memo and Ruling of Assigned Commissioner Regarding 2010 RPS Procurement Plans* (“Scoping Memo”), issued on November 2, 2009, Sierra Pacific Power Company (“Sierra”) hereby respectfully submits its 2010 RPS Supplemental Filing (“Supplement”) to its 2007 Integrated Resource Plan (“IRP”). As requested by the Scoping Memo, this Supplement notifies the California Public Utilities Commission (“Commission”) that Sierra is not presenting any significant changes from its accepted 2009 Supplement. Additionally, Sierra asks the Commission to 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.

Consistent with the invitation provided in the Scoping Memo,¹ this Supplement serves to inform the Commission that Sierra has no significant changes from its accepted 2009 Supplement. Sierra continues to be on track to meet its California Renewables Portfolio Standard (“RPS”) obligation. There are no changes to Sierra’s plans as described in its 2009 Supplement to meet RPS obligations. Sierra will continue to use the same renewable resources described in the 2009 Supplement to satisfy its California RPS requirements. Based on the fact that Sierra is fully resourced and is not proposing any significant changes to its accepted 2009 Supplement, a comprehensive 2010 Supplement is not required. However, Sierra is including

¹ Scoping Memo, pp. 5-6.

minor updates to the forecast data presented in the 2009 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 August 3, 2009, as Appendix B to this Supplement.

Consistent with Decision ("D.") 08-05-029,² Sierra does request 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."³ Since the requirements for supplemental filings filed by multi-jurisdictional utilities ("MJUs") 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."⁴ Accordingly, Sierra asks that the Commission exercise this authority to establish a date certain for 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 this year's filing, Sierra believes it would be more

² D.08-05-029, p. 28 and Ordering Paragraph 10.

³ D.08-05-029, Appendix A.

⁴ D.08-05-029, p. 28.

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.

For the reasons described above, Sierra submits this Supplement to notify the Commission that it is not proposing any significant changes to its accepted 2009 Supplement. Additionally, Sierra asks that the Commission modify the filing date so that future supplemental filings in years that an IRP is not filed are submitted on July 15 rather than at the same time as the large IOUs.

Dated: December 18, 2009

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Appendix A

Minor Updates to Sierra Pacific Power Company's Accepted 2009 Supplement

In its accepted 2009 Supplement, Sierra provided forecast data on peak loads and energy sales. According to the 2009 Supplement:

Sierra's current total system peak load of 1,743 MWs occurred in July 2007. Its forecast 2009 total system peak is expected to be 1,777 MWs. The maximum summer load in the California retail portion of Sierra's Control Area is approximately 75 MWs. The maximum winter load is approximately 150 MWs. Forecast 2009 California retail energy sales are expected to be approximately 556,942 MWh, or a little over six percent (6%) of total forecast 2009 system sales. (Sierra Pacific Power Company 2009 Supplement, pp. 5-6.)

The forecast data has changed since the time that Sierra submitted its 2009 Supplement. There has been a forecast load reduction of 223 MW (about 12.5%). 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.⁵ Sierra's future RPS Compliance Reports will reflect the then-current data.

⁵ SPPC 2010 Budget Forecast, approved August 2009. This forecast was filed on September 1, 2009 with the Public Utility Commission of Nevada as part of Sierra's 2010 Energy Supply Plan. This filing was docketed 09-09001. The filing can be accessed at <http://pucweb1.state.nv.us/pucn/DktInfo.aspx?Util=Electric>. The Technical Appendix contains a summary of the forecast.

Appendix B

Sierra Pacific Power Company's August 2009 RPS Compliance Report

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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 (U903E)

**August 2009 SEMI-ANNUAL COMPLIANCE REPORT
PURSUANT TO THE CALIFORNIA RENEWABLES
PORTFOLIO STANDARD**

3-Aug-09
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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.

RPS COMPLIANCE REPORT - August 2009

- "*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

RPS Compliance Report: Summary

Sierra Pacific Power Company (U903E)	2007
3-Aug-09	

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.06-10-050 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 (U903E)	2008
3-Aug-09	

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	2007
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.06-10-050 and Public Utilities Code Section 399.14(a)

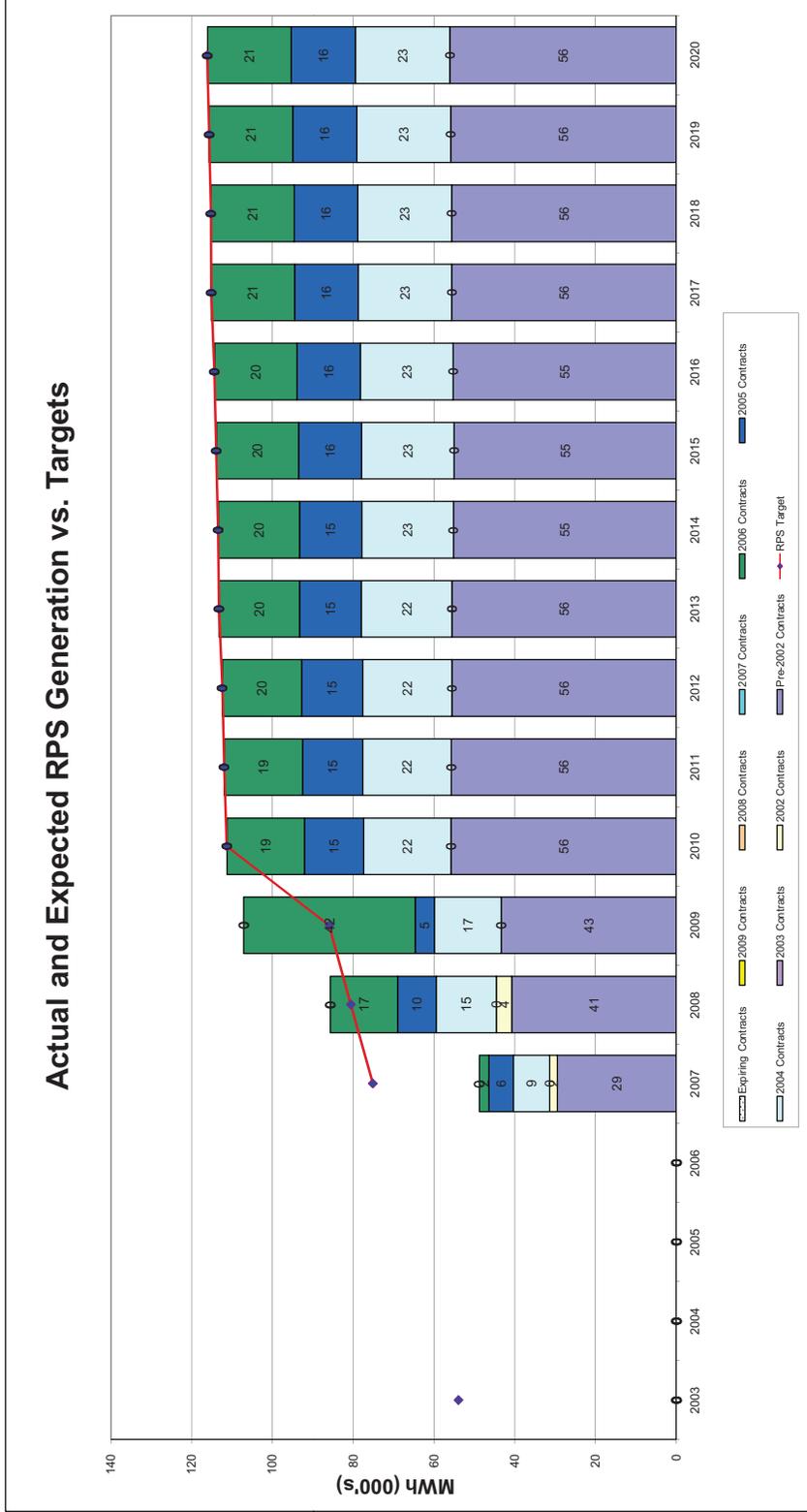
[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferr

- 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.

Sierra Pacific Power Company (U903E)
3-Aug-09

RPS Compliance Report: Performance Chart

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	52,192	52,784	52,784	542,859	544,410	535,273	556,544	559,919	562,182	566,383	567,333	569,627	571,899	575,911	576,321	578,530	580,773	583,052		
Actual RPS Procurement %	0.0%	0.0%	0.0%	0.0%	9.0%	15.7%	20.0%	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	25,370	675	453	840	190	459	454	802	82	442	449		
AFT % (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%		
AFT as MWh Amount	N/A	N/A	N/A	N/A	75,142	80,886	85,938	111,309	111,984	112,436	113,277	113,467	113,925	114,380	115,182	115,264	115,706	116,155		
Preliminary Surplus/(Deficit)	N/A	N/A	N/A	N/A	(26,309)	5,100	21,209	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 (MWh)

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 (RULE 1.11)

I am an attorney for Sierra Pacific Power Company ("SPPC"), the submitting entity. An office 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 therein 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 August 3, 2009 at Sacramento, California.



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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 December 18, 2009 at Sacramento, California.



Jedediah 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 2010 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 e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on December 18, 2009 at Sacramento, California

/s/

Eric Janssen

R.08-08-009
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