

PROPOSED TAC – CLEAN ENERGY SOURCES QUESTIONS – DAVE EMME

1. As a state policy do we prioritize procurement of clean energy (non-fossil) first?

No. It appears to be based primarily on least cost.

2. How do you propose we integrate more clean energy into our energy sources?

Expand the RPS and set a date certain for retirement of at least the NVE share of Valmy, e.g. retire 250 MW of coal generation by 2025.

3. Are there existing statutes that need revision/amendment/deletion in order to implement the broad policy of prioritizing clean energy first? If so, what statutes do you propose be revised/amended/deleted and what is the general direction for your proposal to do so?

NRS 704.746 Public hearing on adequacy of plan; determination by Commission.

6. The Commission shall:

(a) Adopt regulations which determine the level of preference to be given to those measures and sources of supply, *giving the highest priority to energy efficiency and generation of renewable energy*; and

(b) Consider the value to the public of using water efficiently when it is determining those preferences.

4. Are there specific legislative instructions that need to be provided to the PUC?

- Decoupling?
- Loading Order?
- Consideration of externalities and how to quantify?

5. What broad policies are necessary to increase Nevada's opportunities for exportation? What policies do we need to coordinate with the Grid Mod TAC?

6. Should we revise/expand the RPS? If so, what is your proposal for revision/expansion?

Expand the RPS to 35% by 2030 and 40% by 2040.

- What are the impediments to revising/expanding the RPS?

Concerns over grid reliability due to expansion of intermittent renewable generation. Federal land use constraints due to Sage Grouse habitat.

- Should we phase out banked credits?

7. What specific policy actions should occur, if any, related to EE?

Enhance low income EE programs for the period from 2018-2023 to increase opportunities to receive CEIP matching credits if the CPP stay is lifted.

8. Are there existing impediments to further clean energy development that can be controlled by the state?

9. Will any/all of the proposals set forth above ensure that:

- Nevada will be CPP compliant at the time the stay is lifted?

Yes

- Nevada will be in a position to adopt CEIP early-action compliance?

Yes

- Nevada will be trade ready at the time the CPP stay is lifted?

This is not necessary now; there will be ample time to develop CPP regulations that provide for trading if the Stay is lifted.