

BEFORE THE NEVADA GOVERNOR'S OFFICE OF ENERGY DIRECTOR

COMMENT / REPLY INFORMATION FORM

Rulemaking to adopt, amend, or repeal)
regulations pertaining to Chapter 701)
of the Nevada Administrative Code related)
to modifications and additions to NAC701)
_____)

Please complete the following information and submit this form along with your comments¹:

Date of Filing: 10/21/2019

Method of Filing: via Email U.S. Postal Mail [] Fax []

Name of Person Commenting: Michael Saunders, Senior Deputy

Attorney General

Name of Organization (if applicable): Bureau of Consumer Protection (BCP)

Address: 8945 West Russell Road, Suite 204

Las Vegas, Nevada 89148

Phone Number: 702-486-3793

Fax Number:

Email address: msaunders@ag.nv.gov

Do you wish to be placed on the email service list for this matter to receive any further notices? (Mark One)

Yes No []

Note: Submitted comments are part of the public record for the rulemaking and may be posted on the web.¹

Please refrain from making any changes to this form. Thank you.

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7 **COMMENTS OF THE**
8 **BUREAU OF CONSUMER PROTECTION**

9 COMES NOW, the BUREAU OF CONSUMER PROTECTION (“BCP”), and
10 files Comments in support of the Nevada Governor’s Office on Energy (“GOE”) draft
11 regulation (dated September 3, 2019) to amend Nevada Administrative Code
12 (“NAC”) Chapter 701 to implement lighting efficiency standards pursuant to
13 Assembly Bill (“AB”) 54, passed during the 2019 Session of the Nevada Legislature.

14 **COMMENTS**

15 The BCP first notes that lighting represents a significant portion of the
16 electric energy load in Nevada, and thus lighting efficiency standards, such as the
17 one proposed in this rulemaking, can significantly affect the electricity need in
18 Nevada. For example, in 2018, lighting accounted for approximately 15% of the
19 residential load, 9% of the small commercial load and 10% of the larger commercial
20 load in Sierra Pacific Power Company’s (d/b/a NV Energy) (“Sierra”) service
21 territory. Similar lighting loads were forecasted for Nevada Power Company (d/b/a
22 NV Energy) (“Nevada Power”) in 2018, with lighting accounting for approximately
23 14% of the residential load, 10% of the small commercial load and 13% of the larger
24 commercial load.¹ Lighting is a large part of the electric load in Nevada.

25 Historically, lighting also has been a large contributor to energy savings from
26 utility programs to improve end use energy efficiency, both in the residential and
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¹ Based on the 2018 Joint Integrated Resource Plan and supporting workpapers filed by Nevada Power Company and Sierra Pacific Power Company (Docket 18-06003).

1 commercial sectors. Utility incentive programs exist here in Nevada and in other
2 states to encourage customers to use energy efficient lamps, including programs to
3 assist low income customers to implement high efficiency lighting. However, utility
4 incentive programs, such as Nevada Power and Sierra's Residential Lighting
5 programs (which partner with manufacturers and retailers to provide discounted
6 pricing for energy efficient lamps at participating retail locations), are paid for by
7 all ratepayers. Improving lighting efficiency through utility incentive programs
8 increases the rates of all customers in the short term, including those who do not
9 participate in the utility lighting programs, compared to implementing lighting
10 efficiency standards.

11 The GOE's proposed regulation in this matter will help ensure that all
12 customers save energy and money with high efficiency lighting, regardless of
13 income, regardless of the awareness of energy efficient lighting, regardless of other
14 barriers that prevent customers from installing efficient lamps. Participants in
15 efficient lighting, whether as a result of customer preference or utility incentives,
16 save money. Efficient lamps, even assuming they have higher initial costs, quickly
17 pay for themselves through energy savings. The proposed regulation will help
18 ensure that all customers participate in efficient lighting, and thus that the
19 utilities, and their ratepayers, get the full economic benefit of efficient lighting
20 under the general service lamps covered by AB 54.

21 In addition, the regulation will benefit Nevada consumers by reducing the
22 amount of capacity and energy that utilities supply to serve lighting loads. As
23 described above, participants save money by adopting efficient lighting. In
24 addition, efficient lighting also contributes to reducing the overall utility costs of
25 service by reducing the overall load, and thus reducing the need for additional
26 power supply resources, transmission facilities, distribution facilities and fuel. The
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1 reduced need for additional generation, transmission and distribution facilities
2 reduces need for utility investments in capacity and in utility costs to serve their
3 customers. Ultimately, this will result in long term lower costs for all utility
4 customers.

5 CONCLUSION

6 Based on the foregoing, the BCP supports adoption of the proposed regulation
7 in time for the January 1, 2020 mandate in AB 54. The BCP appreciates the GOE's
8 efforts in this matter and the opportunity to file these Comments and looks forward
9 to participating in the upcoming hearing.²

10 Respectfully submitted October 21, 2019.

11 ERNEST FIGUEROA
12 Consumer Advocate

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14 MICHAEL SAUNDERS
15 Senior Deputy Attorney General
16 10791 W. Twain Avenue, Suite 100
17 Las Vegas, NV 89135
18 msaunders@ag.nv.gov
19 Attorneys for the State of Nevada

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25 ² At the upcoming hearing, the BCP may have some questions that the plain language of the
26 regulation does not address. For example, the BCP may, for the sake of clarity, have questions about
27 the GOE's vision of how compliance with the 45 lumens per watt standard for general service lamps
28 will be monitored and enforced.