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# Original Filing

Public Utilities Commission of Nevada  
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Filed For: Holland and Hart LLP

In accordance with NRS Chapter 719,  
this filing has been electronically signed and filed  
by: /s Cecilia Martin

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By electronically filing the document(s),  
the filer attests to the authenticity of the electronic signature(s) contained therein.

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This filing has been electronically filed and deemed to be signed by an authorized  
agent or  
representative of the signer(s) and  
Holland and Hart LLP



Bryce C. Alstead  
Partner  
Phone 775.327.3067  
Fax  
balstead@hollandhart.com

September 22, 2023

**VIA ELECTRONIC FILING**

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

**Re: Docket No. 23 - \_\_\_\_\_ - Notice of GridLiance West LLC of an application for approval to construct an up to 500-kV AC overhead transmission line, five switchyards, and associated facilities in Nye County Nevada under the Utility Environmental Protection Act**

Dear Ms. Osborne:

Accompanying this letter for filing with the Public Utilities Commission of Nevada is GridLiance West LLC's notice under NAC 703.421 that it will be filing an SF-299 application for Transportation and Utility Facilities on Federal Lands with the U.S. Bureau of Land Management for a right-of-way for the construction, operation, maintenance, and decommissioning of the Johnnie Corner to Beatty Transmission Line Upgrade Project which will consist of an approximately 57.7-mile-long transmission line with a voltage of up to 500-kilovolts, five switchyards, and associated facilities located in Nye County, Nevada.

Should you have any questions, please feel free to contact me.

Sincerely,

/s/ Bryce C. Alstead

Bryce C. Alstead  
Partner  
of Holland & Hart LLP

BCA:cpm  
Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Notice of GridLiance West LLC of an application )  
for approval to construct an up to 500-kV AC overhead )  
transmission line, five switchyards, and associated ) Docket No. 23-\_\_\_\_\_  
facilities in Nye County Nevada under the Utility )  
Environmental Protection Act )

**NOTICE OF GRIDLIANCE WEST LLC OF AN APPLICATION FOR APPROVAL  
TO CONSTRUCT AN UP TO 500-KV AC OVERHEAD TRANSMISSION LINE,  
FIVE SWITCHYARDS, AND ASSOCIATED FACILITIES LOCATED IN NYE  
COUNTY, NEVADA, UNDER THE UTILITY ENVIRONMENTAL PROTECTION  
ACT**

**I. Introduction**

Pursuant to the Nevada Utility Environmental Protection Act (“UEPA”), Sections 704.820 to 704.900 of the Nevada Revised Statutes (“NRS”), and Sections 703.415 to 703.427 of the Nevada Administrative Code (“NAC”), GridLiance West LLC (the “Applicant”), hereby provides the Public Utilities Commission of Nevada (“Commission”) with this notice under NAC 703.421 (“Notice”) that it will be filing a SF-299 Application for Transportation and Utility Facilities on Federal Lands (“SF-299”) with the United States Bureau of Land Management (“BLM”) for a right-of-way for the construction, operation, and decommissioning of an approximately 57.7-mile-long transmission line with a voltage of up to 500-kilovolts (“kV”), five switchyards, and associated facilities located on approximately 1,827 acres of BLM-administered land and approximately 97 acres of private land located in Nye County, Nevada (collectively, the “Project”).

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1 All correspondence related to this Notice should be sent to the below:

2 Ray Loving  
3 GridLiance West LLC  
4 c/o NextEra Energy Resources LLC  
5 700 Universe Boulevard  
6 Juno Beach, Florida 33408  
7 [Raymond.Loving@nexteraenergy.com](mailto:Raymond.Loving@nexteraenergy.com)

8 and

9 Bryce C. Alstead  
10 Amber L. Rudnick  
11 Holland & Hart LLP  
12 5441 Kietzke Lane, Second Floor  
13 Reno, NV 89511  
14 [balstead@hollandhart.com](mailto:balstead@hollandhart.com)  
15 [alrudnick@hollandhart.com](mailto:alrudnick@hollandhart.com)

16 The Project includes the development, construction, operation, and decommissioning of  
17 an overhead transmission line, five new switchyards, a double optical ground wire, access roads,  
18 and other associated facilities to be located on private land and federal land administered by the  
19 BLM. The voltage of the transmission line will be either 500-kV or 230-kV. In either case, this  
20 voltage is above the respective threshold for UEPA regulation; thus, the components of the  
21 Project qualify as a “utility facility” as defined by NRS 704.860(2). Accordingly, Applicant is  
22 providing this Notice of the Project pursuant to NRS 704.870(2)(a).

23 The Applicant requests that the Commission accept this Notice under UEPA as  
24 complying with NRS 704.870(2)(a) and NAC 703.421. Within thirty (30) days of the issuance of  
25 a final Environmental Assessment or Environmental Impact Statement for the Project,<sup>1</sup> the  
26 Applicant will submit a detailed UEPA application for approval of a Permit to Construct  
27 pursuant to NRS 704.870(2)(b).

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<sup>1</sup> Note that it is currently unknown whether the BLM will require an Environmental Assessment or an Environmental Impact Statement for the Project.

**Information Required Pursuant to NAC 703.421**

**1. The name, address and telephone number of the person who filed the application with the appropriate federal agency.**

The name, address, and telephone number of the person who will be filing the SF-299 for the Project is:

Ray Loving  
GridLiance West LLC  
c/o NextEra Energy Resources LLC  
700 Universe Boulevard  
Juno Beach, Florida 33408  
Telephone: (346) 234-5636

**2. The date on which the application was filed with the appropriate federal agency.**

The SF-299 for the Project will be submitted to the BLM on or about September 22, 2023.

**3. A general description of the location of the proposed utility facility.**

The Project area is comprised of approximately 1,924 acres in Nye County, Nevada. The Project would be primarily on public lands administered by the BLM Pahrump and Tonopah Field Offices. A small portion of the Applicant-proposed transmission line route and supporting switchyard locations would be on private lands within Nye County. *See* Project Map, attached hereto as **Exhibit 1**. More specifically, The Project is found on the Mount Schader, Amargosa Flat, Devils Hole, Skeleton Hills, South of Amargosa Valley, Striped Hills, Lathrop Wells, Big Dune, Ashton, Carrara Canyon, and Gold Center, Nevada, U.S. Geological Survey 7.5-minute quadrangles. A more detailed description of the location of the Project will be provided in the application which the Applicant will submit following the issuance of the Project's Environmental Assessment or Environmental Impact Statement, as applicable.

**4. A general description of the proposed utility facility.**

The Project will consist of an approximately 57.7-mile-long alternating current ("AC") transmission line with a voltage of either 500-kV or 230-kV. The final voltage requirements of the proposed transmission line will be identified in response to ongoing transmission planning

processes being completed by CAISO and generation interconnection requests received by GridLiance prior to the issuance of any decision on the Project by the BLM.

In addition to the transmission line, the Project would include five new switchyards (Vista Switchyard Upgrade, Johnnie Corner Switchyard, Valley Switchyard, Lathrop Switchyard, and Gold Center Switchyard), a double optical ground wire, access roads, and other associated facilities. The Vista Switchyard Upgrade would be located on approximately 40 acres of private lands within Nye County, Nevada, with an optional location of the same size also located on private lands. The other switchyards would be located solely on BLM land. The Johnnie Corner Switchyard would rest on approximately 45 acres, and the Valley Switchyard and Lathrop Switchyard would rest on approximately 30 acres. The Gold Center Switchyard would be located on approximately 30 acres, to be sited within an identified 200-acre area on BLM-administered lands.

The Project is considered an upgrade of an existing 61.3-mile-long single-circuit 138-kV overhead transmission line owned by Valley Electric Association (VEA) (BLM ROWs N-59100 and N-29793). This existing 138-kV line is nearing retirement by VEA, and Applicant has no influence or bearing on the timeline or decision by VEA to decommission the existing 138-kV line. VEA's existing line would remain in place and under VEA ownership after the Project's construction. The Applicant expects that the Project will be constructed in a single phase which will last 18–24 months. The required in-service date for the Project would be December 2027.

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

A copy of this notice has been submitted to, among others, the Regulatory Operations Staff of the Commission, the Bureau of Consumer Protection, the Nevada State Clearinghouse within the Department of Conservation and Natural Resources, and the Nye County Clerk. *See* Certificate of Service to this Notice.

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## 1. Draft Public Notice

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Holland & Hart LLP and on September 22, 2023, I caused to be served a true and correct copy of the foregoing document to the following:

**ELECTRONIC MAIL**

Nevada State Clearinghouse  
Department of Conservation & Natural  
Resources,  
Division of State Lands  
901 S. Stewart Street, Ste. 5003  
Carson City, NV 89701  
[nevadaclearinghouse@lands.nv.gov](mailto:nevadaclearinghouse@lands.nv.gov)

**ELECTRONIC MAIL**

Jennifer Carr  
Nevada Division of Environmental  
Protection  
901 S. Stewart Street, Suite 4001  
Carson City, NV 89701  
[Jcarr@ndep.nv.gov](mailto:Jcarr@ndep.nv.gov)

**ELECTRONIC MAIL**

Staff Counsel Support  
Public Utilities Commission of Nevada  
1150 E. William Street  
Carson City, NV 89701-3109  
[Pucn.sc@puc.nv.gov](mailto:Pucn.sc@puc.nv.gov)

**ELECTRONIC MAIL**

Ernest Figueroa, Esq.  
Nevada State Consumer Advocate  
Bureau of Consumer Protection  
100 N. Carson Street  
Carson City, NV 89701  
[bcpserv@ag.nv.gov](mailto:bcpserv@ag.nv.gov)

**U.S. MAIL TRANSMITTAL:**

Nye County Clerk  
1520 E. Basin Ave  
Pahrump, NV 89060

/s/Cecilia Martin  
Cecilia Martin, Legal Secretary  
an employee of Holland & Hart LLP



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**Exhibit “1”**  
**Project Map**  
[see attached]

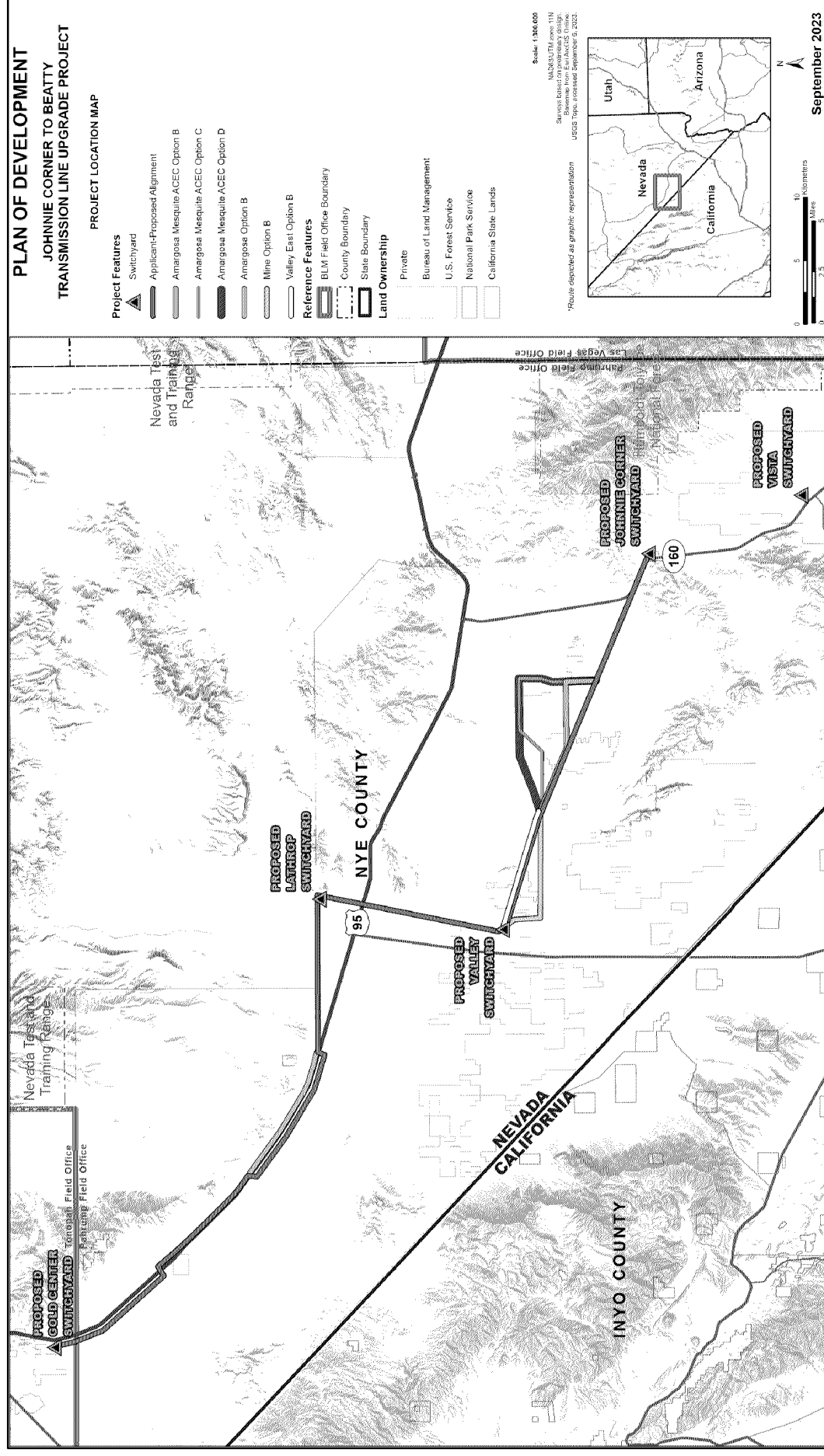


Figure 1. Johnnie Corner to Beatty Transmission Line Upgrade Project location: Overview.

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**Exhibit “2”**  
**Draft Public Notice**  
[see attached]

**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 of GridLiance West LLC of an application for approval to construct an up to 500-kV AC overhead transmission line, five switchyards, and associated facilities located in Nye County, Nevada under the Utility Environmental Protection Act (“UEPA”).*

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)):

*GridLiance West LLC*

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)):

*GridLiance West LLC (the “Applicant”) is filing a notice pursuant to NAC 703.421 (“Notice”) that it will be filing an SF-299 Application for Transportation and Utility Facilities on Federal Lands (“SF-299”) with the United States Bureau of Land Management (“BLM”) for a right-of-way for the construction, operation, maintenance, and decommissioning of an approximately 57.7-mile-long transmission line with a voltage of up to 500-kilovolts (“kV”), five switchyards, and associated facilities located on approximately 1,827 acres of BLM-administered land and approximately 97 acres of private land located in Nye County, Nevada (collectively, the “Project”).*

*On or about September 22, 2023, the Applicant will file the SF-299 with the BLM, which in turn will begin the federal environmental review process with the BLM. Upon the issuance of the final Environmental Assessment or Environmental Impact Statement for the Project, the Applicant will then file an application for the approval of a UEPA Permit to Construct pursuant to NRS 704.870(2)(b).*

*The Project will include the development, construction, operation, and decommissioning of the Project on private lands and federal land administered by the BLM. The voltage of the Gen-Tie Line will be either 230-kV or 500-kV, depending on the voltage requirements of soon to be released transmission planning studies and generation interconnection requests. Both voltages are above the threshold for UEPA regulation, thus this Project qualifies as a “utility facility” as defined by NRS 704.860 (2). Accordingly, Applicant is providing this Notice of the Project pursuant to NRS 704.870(2)(a).*

*The Project will not have any adverse effects on the health, safety, or welfare of Nevada residents, but will instead provide economic benefits, including jobs and revenue, to the State of Nevada and Nevada's residents. Because the Project will be owned by the Applicant, which is not a public utility in Nevada and whose costs of the Project will not be passed down to Nevada's ratepayers, this proceeding will have no effect on Nevada consumers.*

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute ("NRS") 704.069(1)<sup>2</sup>:

*A consumer session is not required by NRS 704.069.*

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.

*This application does not pertain to a tariff filing.*

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<sup>2</sup> 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.

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**Exhibit “3”**

**Proof of compliance with the Nevada Department of Wildlife’s Energy Cost Recovery Fund  
Program (NRS 701.600 - .640)**

[see attached]

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

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

Project Name Johnnie Corner to Beatty Transmission Line  
Applicant GridLiance West, LLC  
Mailing Address 1 California Street, Suite 1600  
City San Francisco State CA Zip Code 94111-5401  
Name of Contact Raymond Loving Phone 713-236-3654 Email Raymond.Loving@nexteraenergy.com  
Name of Responsible Corp. Officer/Agency Rep. Natalie Smith Title Vice President, GridLiance West, LLC

Applicant:

☐ Self  
☒ Private Company  
☐ Government Agency  
☐ Other \_\_\_\_\_

## Project Type

☐ Solar ☐ Wind ☐ Geothermal ☐ Fossil Fuel ☐ Biomass ☐ Fuel Pipeline ☒ Power Transmission ☐ Other

Net Maximum Generation Capacity \_\_\_\_\_ MW Estimated Voltage (power transmission) 230 or 500 kV

Proposed Project Size (acres) \_\_\_\_\_ Proposed Transmission Length (miles) 61


Proposed Length of Fuel Lines/Pipelines (miles) \_\_\_\_\_

Other Infrastructure (e.g., evaporation/holding ponds or tanks, recharge stations; estimated acres) Includes switchyards (220 acres), laydown yards (72 acres), and access roads (173.04 to 177.17 acres).

Proposed County Location (submit project map and shapefiles) Nye County

Project Description The Project is an approximately 57.7-mile-long double-circuit 230-kilovolt (kV) or 500-kV alternating current overhead transmission line extending between the proposed Johnnie Corner Switchyard, located approximately 16 miles north of the town of Pahrump, Nevada, adjacent to State Route 160, and the proposed Gold Center Switchyard, located approximately 3 miles south of the town of Beatty, Nevada, adjacent to U.S. Route 95. The Project includes switchyards, a double optical ground wire, access roads, and other associated facilities.

Estimated Project Schedule/Timeline The Project is expected to take 22 months to construct, with construction anticipated to commence in December 2027 following the completion of the environmental and permitting process.

Applicant Signature  Natalie F. Smith  
Vice President Date 9/18/2023

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 project shapefiles (ArcGIS or GoogleEarth are acceptable) to: Jasmine Kleiber at [jkleiber@ndow.org](mailto:jkleiber@ndow.org)

Submit application, payment, and maps to:

Nevada Department of Wildlife  
Habitat Division – AB307  
6980 Sierra Center Parkway, Suite 120  
Reno, NV 89511 USA

Revised 10/2020