December 1, 2014

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: NV Energy, Inc.
Order No. 676-H Compliance Filing on behalf of Nevada Power Company
and Sierra Pacific Power Company, collectively d/b/a NV Energy
Docket No. ER15-___-000

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act\(^1\) and Part 35 of the regulations of the Federal Energy Regulatory Commission (the “Commission”),\(^2\) Nevada Power Company d/b/a NV Energy (“NV Energy”), submits for filing proposed amendments to Section 4.2 of its open access transmission tariff (“OATT”)\(^3\) in compliance with the Commission’s directives in Order No. 676-H.\(^4\) In addition to incorporating by reference certain revised standards adopted by the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”), as directed by Order No. 676-H, NV Energy also herein requests waiver of NAESB standards WEQ-008, WEQ-015, and WEQ-021 for the reasons stated below. NV Energy

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\(^3\) Nevada Power is the designated filer for the OATT shared by Nevada Power and Sierra Pacific Power Company (“Sierra Pacific”). On October 24, 2014, Sierra Pacific filed a certificate of concurrence indicating its intent to be governed by the Nevada Power OATT without limitation. Therefore, no filing will be made on behalf of Sierra Pacific.

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respectfully requests the Commission accept this filing with an effective date of February 2, 2015, consistent with Order No. 676-H.  

I. Contents of Filing

This filing consists of the following:

- This transmittal letter
- Revised Section 4 tariff sheet in clean form
- Revised Section 4 tariff sheet in red-lined form

II. Discussion


Order No. 676-H provided transmission providers with two compliance options: (1) incorporate the complete set of NAESB standards into their OATTs without modifications; or (2) identify in their OATTs the applicable standards which the Commission has specifically incorporated by reference in its regulations. NV Energy has elected the second option and specifically enumerates the NAESB standards it is incorporating by reference into Section 4.2 of its OATT.

NV Energy respectfully requests waiver of Standards WEQ-008, WEQ-015, and WEQ-021, as these standards are not applicable to NV Energy. NV Energy is renewing its waiver request for WEQ-008, which applies only to transmission providers located in the Eastern Interconnection. WEQ-015 and WEQ-021 apply only to transmission providers operating in organized ISO/RTO wholesale markets, and NV Energy does not. The tariff proposed in this

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5 NV Energy notes that OATI filed on November 21, 2014 a request for an extension of the February 2, 2015 implementation and effective date, which would allow OATI time to create and deploy the OASIS software changes needed to support the relevant NAESB standards. NV Energy is dependent upon OATI to implement standards that require software changes to NV Energy’s OASIS. NV Energy therefore requests that it be granted the same implementation and effective date as determined by the Commission in response to OATI’s request, and as consistent with the availability of the OATI software changes.

6 The Commission approved the prior waiver request for WEQ-008 in its November 13, 2008 Order, 125 FERC ¶ 61,170.
filing notes that NV Energy has requested a waiver of these standards. Should the Commission grant the waivers, NV Energy will submit an additional filing revising Section 4.2 of its OATT noting Commission acceptance of these waiver requests.

In furtherance of this compliance filing, and consistent with Commission precedent, NV Energy proposes additional language to Section 4.2 of its OATT clarifying that certain product reservations contemplated by the revised and accepted NAESB standards are not provided by NV Energy. Specifically, NV Energy does not provide the following services provided for by the NAESB standards: (1) Sliding Daily (WEQ 001-2.1.6); (2) Sliding Weekly (WEQ 001-2.1.7); (3) Sliding Monthly (WEQ 001-2.1.9); (4) Extended Daily (WEQ 001-2.1.10); (5) Extended Weekly (WEQ 001-2.1.11); (6) Extended Monthly (WEQ 001-2.1.12); (7) Extended Yearly (WEQ 001-2.1.13); and Next Increment Hourly/Next Hour Market (WEQ-001.2.1.14/WEQ-001-7).

NV Energy believes that these proposed revisions further compliance with Order No. 676-H by incorporating the relevant NAESB standards by reference, seeking waiver of those that do not apply, and clarifying which services within the NAESB standards are not offered under the NV Energy OATT.

III. Communications and Service

Communications regarding this filing should be addressed to the following individuals, who should be entered on the official service lists maintained by the Secretary of the Commission for each docket established with respect to any of the documents included in this filing:

Lauren Rosenblatt  
Attorney*  
6226 W. Sahara Avenue  
Las Vegas, NV 89146  
Tel: (702) 402-5794  
Email: LRosenblatt@nvenergy.com  
*Admitted in DC, NY and VA; certification as corporate counsel in NV pending.

Jim McMorran  
Manager, Transmission Strategy  
6100 Neil Road  
Reno, NV 89511  
Tel: (775) 834-4640  
Email: jmcmorran@nvenergy.com

J. Ashley Cooper  
Parker Poe Adams & Bernstein LLP  
200 Meeting Street, Suite 301  
Charleston, SC 29401-3156  
Tel: (843) 727-2674  
Email: ashleycooper@parkerpoe.com

See Cargill Power Markets, LLC, 132 FERC ¶ 61,079 at P 22 (2010) (“While the Commission does not require transmission providers to adopt each of the flexible services included in the NAESB Standards, the Commission does require the OATT to accurately state which services it actually offers.”)
Pursuant to 18 C.F.R. § 385.2010(f)(i) of the Commission’s regulations, NV Energy is serving a copy of this filing by electronic means on all customers taking service under the NV Energy OATT, as well as on the Public Utilities Commission of Nevada.

IV. Effective Date and Waivers

NV Energy respectfully requests that the Commission grant any and all waivers necessary to accept this filing. Additionally, NV Energy requests that the Commission accept this filing with an effective date of February 2, 2015.\(^8\)

V. Conclusion

NV Energy respectfully requests that the Commission accept the revisions to its OATT described herein. If any questions arise regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,
NV Energy

/s/ J. Ashley Cooper

J. Ashley Cooper
Parker Poe Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401-3156
Tel: (843) 727-2674
Email: ashleycooper@parkerpoe.com

Attorney for
NV Energy

\(^8\) See supra n.5.
4 Open Access Same-Time Information System (OASIS)

4.1 Terms and Conditions:

Terms and conditions regarding Open Access Same-Time Information System and standards of conduct are set forth in 18 CFR § 37 of the Commission's regulations (Open Access Same-Time Information System and Standards of Conduct for Public Utilities) and 18 CFR § 38 of the Commission’s regulations (Business Practice Standards and Communication Protocols for Public Utilities). In the event available transfer capability as posted on the OASIS is insufficient to accommodate a request for firm transmission service, additional studies may be required as provided by this Tariff pursuant to Sections 19 and 32.

The Transmission Provider shall post on OASIS and its public website an electronic link to all rules, standards and practices that

(i) relate to the terms and conditions of transmission service,

(ii) are not subject to a North American Energy Standards Board (NAESB) copyright restriction, and

(iii) are not otherwise included in this Tariff.

The Transmission Provider shall post on OASIS and on its public website an electronic link to the NAESB website where any rules, standards and practices that are protected by copyright may be obtained. The Transmission Provider shall also post on OASIS and its public website an electronic link to a statement of the process by which the Transmission Provider shall add, delete or otherwise modify the rules, standards and practices that are not included in this tariff. Such process shall set forth the means by which the Transmission Provider shall provide reasonable advance notice to Transmission Customers and Eligible Customers of any such additions, deletions or modifications, the associated effective date, and any additional implementation procedures that the Transmission Provider deems appropriate.

Pursuant to the Commission’s April 25, 2006 Final Rule, Order No. 676 (115 FERC ¶ 61,102), April 19, 2007 Final Rule, Order No. 676-B (119 FERC ¶ 61,049), July 21, 2008 Final Rule, Order No. 676-C (124 FERC ¶ 61,070), November 24, 2009 Final Rule, Order No. 676-E (129 FERC ¶61,162), and September 18, 2014 Final Rule, Order No. 676-H (148 FERC ¶ 61,205) amending its regulations under the Federal Power Act, Transmission Provider hereby incorporates by reference the following standards promulgated by the NAESB WEQ:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);


- WEQ-004, Coordinate Interchange, WEQ Version 003, (with final action ratified Dec. 28, 2012);
Transmission Provider has a pending request for waiver of the following standards:

- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012);
- WEQ-015, Measurement and Verification of Whole Electricity Demand Response, WEQ Version 003, July 31, 2012; and

Transmission Provider does not provide for the following product reservations as described in the NAESB standards:

- Sliding Daily (WEQ 001-2.1.6);
- Sliding Weekly (WEQ 001-2.1.7);
- Sliding Monthly (WEQ 001-2.1.9);
- Extended Daily (WEQ 001-2.1.10);
- Extended Weekly (WEQ 001-2.1.11);
- Extended Monthly (WEQ 001-2.1.12);
• Extended Yearly (WEQ 001-2.1.13); and
• Next Increment Hourly/Next Hour Market (WEQ-001-2.1.14/WEQ-001-7).
4 Open Access Same-Time Information System (OASIS)

4.1 Terms and Conditions:

Terms and conditions regarding Open Access Same-Time Information System and standards of conduct are set forth in 18 CFR § 37 of the Commission's regulations (Open Access Same-Time Information System and Standards of Conduct for Public Utilities) and 18 CFR § 38 of the Commission’s regulations (Business Practice Standards and Communication Protocols for Public Utilities). In the event available transfer capability as posted on the OASIS is insufficient to accommodate a request for firm transmission service, additional studies may be required as provided by this Tariff pursuant to Sections 19 and 32.

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(i) relate to the terms and conditions of transmission service,

(ii) are not subject to a North American Energy Standards Board (NAESB) copyright restriction, and

(iii) are not otherwise included in this Tariff.

The Transmission Provider shall post on OASIS and on its public website an electronic link to the NAESB website where any rules, standards and practices that are protected by copyright may be obtained. The Transmission Provider shall also post on OASIS and its public website an electronic link to a statement of the process by which the Transmission Provider shall add, delete or otherwise modify the rules, standards and practices that are not included in this tariff. Such process shall set forth the means by which the Transmission Provider shall provide reasonable advance notice to Transmission Customers and Eligible Customers of any such additions, deletions or modifications, the associated effective date, and any additional implementation procedures that the Transmission Provider deems appropriate.

Effective: February 2, 2015
4.2 **North American Energy Standards Board (NAESB) Wholesale Electric Quadrant (WEQ):**

Pursuant to the Commission’s April 25, 2006 Final Rule, Order No. 676 (115 FERC ¶ 61,102), April 19, 2007 Final Rule, Order No. 676-B (119 FERC ¶ 61,049), July 21, 2008 Final Rule, Order No. 676-C (124 FERC ¶ 61,070), and its November 24, 2009 Final Rule, Order No. 676-E (129 FERC ¶ 61,162), and September 18, 2014 Final Rule, Order No. 676-H (148 FERC ¶ 61,205), amending its regulations under the Federal Power Act, Transmission Provider hereby incorporates by reference the following standards promulgated by the NAESB WEQ:

- **WEQ-000**, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);

- **WEQ-001**, Open Access Same-Time Information Systems (OASIS), OASIS Version 2.0, Version 002-1, March 11, 2009, as modified by NAESB final action ratified on Dec. 28, 2009-1.1, March 11, 2009, (with minor corrections applied May 29, 2009 and September 8, 2009-Nov. 26, 2013), excluding with the exception of Standards 001-0.1, 001-0.9 through 001-0.13, 001-1.0, 001-9.7, 001-14.1.3, and 001-15.1.2, and 001-106.2.5;


Effective: February 2, 2015
minor corrections applied May 29, 2009 and September 8, 2009 Nov. 26, 2013);


• WEQ-004, Coordinate Interchange, (WEQ-004, Version 003.2.1, March 11, 2009, with final action ratified Dec. 28, 2012 minor corrections applied May 29, 2009 and September 8, 2009);

• WEQ-005, Area Control Error (ACE) Equation Special Cases, (WEQ-005, Version 003.2.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);

• WEQ-006, Manual Time Error Correction, (WEQ-006, Version 003.4, October 31, 2007, with minor corrections applied on Nov. 16, 2007 July 31, 2012);

• WEQ-007, Inadvertent Interchange Payback, (WEQ-007, Version 003.3.2.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009 July 31, 2012);

• WEQ-011, Gas/Electric Coordination, (WEQ- Version 003.11, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009 July 31, 2012);

• WEQ-012, Public Key Infrastructure (PKI), (WEQ-012, Version 003.2.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009); and

Pursuant to the Commission’s November 13, 2008 Acceptance Order (125 FERC ¶61,170) of the Companies’ Order 676-C Filing on September 17, 2008, the Transmission Provider has a pending request hereby states that in that Acceptance Order a waiver was received from of the following standards:

- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, (WEQ-008, Version 003, July 31, 2012); and
- WEQ-015, Measurement and Verification of Whole Electricity Demand Response, WEQ Version 003, July 31, 2012; and

Transmission Provider does not provide for the following product reservations as described in the NAESB standards:

- Sliding Daily (WEQ 001-2.1.6);
- Sliding Weekly (WEQ 001-2.1.7);
- Sliding Monthly (WEQ 001-2.1.9);
- Extended Daily (WEQ 001-2.1.10);
- Extended Weekly (WEQ 001-2.1.11);
- Extended Monthly (WEQ 001-2.1.12);
- Extended Yearly (WEQ 001-2.1.13); and
- Next Increment Hourly/Next Hour Market (WEQ-001-2.1.14/WEQ-001-7).