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Filed For: Citadel Solar LLC

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

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the filer attests to the authenticity of the electronic signature(s) contained therein.

This filing has been electronically filed and deemed to be signed by an authorized
agent or
representative of the signer(s) and
Citadel Solar LLC

**BULLEN LAW, LLC
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January 18, 2020

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

Re: Application of Citadel Solar LLC Under the Provisions of the Utility Environmental Protection Act for a Permit to Construct the Citadel Solar Project and Ancillary Facilities; Docket No: 20-_____

Dear Ms. Osborne:

Enclosed for filing with the Public Utilities Commission of Nevada please find the Application of Citadel Solar LLC Under the Provisions of the Utility Environmental Protection Act for a Permit to Construct the Citadel Solar Project and Ancillary Facilities. This filing is accompanied by the \$200 filing fee.

Please contact me if you have any questions regarding this filing.

Best Regards,

/s/ Linda M. Bullen

Linda M. Bullen

Attorney for Citadel Solar LLC

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BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

IN THE MATTER OF:
Application of Citadel Solar LLC Under the
Provisions of the Utility Environmental
Protection Act for a Permit to Construct the
Citadel Solar Project and Ancillary Facilities

Docket No. 20-_____

**APPLICATION OF CITADEL SOLAR LLC UNDER THE PROVISIONS OF THE
UTILITY ENVIRONMENTAL PROTECTION ACT FOR A PERMIT TO CONSTRUCT
THE CITADEL SOLAR PROJECT AND ANCILLARY FACILITIES**

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LIST OF EXHIBITS

- A. Site Location Map
- B. Regional Map
- C. Legal Description of Proposed Facility
- D. Scaled Site Plan Drawings
- E. Facility Drawing
- F. Environmental Statement
- G. Proof of Publication
- H. Proof of Service to County Clerk, Nevada State Clearinghouse and Other Agencies
- I. NDOW Energy Planning and Conservation Fund Application for Energy Projects
- J. Draft Notice

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

**IN THE MATTER OF:
Application of Citadel Solar LLC Under the
Provisions of the Utility Environmental
Protection Act for a Permit to Construct the
Citadel Solar Project and Ancillary Facilities**

Docket No. 20-

**APPLICATION OF CITADEL SOLAR LLC UNDER THE PROVISIONS OF
THE UTILITY ENVIRONMENTAL PROTECTION ACT FOR A PERMIT TO
CONSTRUCT THE CITADEL SOLAR PROJECT AND ANCILLARY FACILITIES**

Citadel Solar LLC (“Citadel” or “Applicant”) hereby submits this Application to the Public Utilities Commission of Nevada (the “Commission”) under the Utility Environmental Protection Act (“UEPA”) for Permit to Construct the Citadel Solar Project and ancillary facilities (the “Application”). The Application is made pursuant to Nevada Revised Statutes (“NRS”) 704.820 to 704.900 and Nevada Administrative Code (“NAC”) 703.415 to 703.427. Citadel submits the following information in support of its Application.

INTRODUCTION

The Project is a 250-megawatt alternating current (“MW/ac”) photovoltaic (“PV”) solar electric generating facility which will include a Battery Energy Storage System (“BESS”), transmission lines, access roads and other ancillary facilities (the “Project”). The Project is to be constructed on approximately 2,188 acres of private lands located near the Tahoe Reno Industrial Complex in Storey County, Nevada. Citadel requests that the Commission authorize the issuance of two Permits to Construct (“PTCs”), one for Phase 1, which includes an approximately 860 acre 100 megawatt alternating current (“MW/ac”) solar field and ancillary facilities and a 120 kilovolt (“kV”) overhead transmission line (“Phase 1”) and a second PTC for a 1262 acre 150 MW/ac solar field and ancillary facilities (“Phase 2”). The permits for each phase are detailed in Paragraph 11 below.

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LEGAL AUTHORITY

The Project is located entirely on non-federal lands, and therefore, no environmental analysis is required by any federal agency. Accordingly, this Application is filed pursuant to the requirements of NRS 704.870(1) and NAC 703.423.

**ALLEGATIONS OF MATERIAL FACT
INFORMATION REGARDING THE APPLICANT**

Citadel, the developer of the Project, is an affiliate of CD Clean Energy and Infrastructure VII JV, LLC, a fund under the management of Capital Dynamics, Inc., which manages several funds that are nationwide developers and owners of renewable energy facilities.

Citadel's principal place of business and mailing address is:

Citadel Solar LLC
c/o CD Arevon Asset Management
8800 N. Gainey Center Dr., Ste. 250
Scottsdale, AZ 85258

All correspondence related to this Application should be sent to the counsel for the Applicant:

Linda M. Bullen
Bullen Law, LLC
8635 W. Sahara Ave. #454
Las Vegas, NV 89117
linda@bullenlaw.com
702-279-4040

RESPONSES TO REQUIRED DISCLOSURES

The information required by NAC 703.421 and 703.423 is provided below.

1. **A description of the location of the proposed utility facility as required by subsection 1 of NRS 704.870 including:**
 - (a) **A general description of the location of the proposed utility facility, including a regional map that identifies the location of the proposed facility. (NAC 703.423(1)(a))**

1 The Project is located on privately owned land near the Tahoe Reno Industrial Complex in
2 Storey County, Nevada. See Exhibit A, Site Location Map. A regional map showing the location
3 of the Project is attached as Exhibit B.

4 **(b) A legal description of the site of the proposed utility facility, with the**
5 **exception of electric lines, gas transmission lines, and water and**
6 **wastewater lines, for which only a detailed description of the site is**
7 **required. (NAC 703.423(1)(b))**

8 A legal description of the Project is attached as Exhibit C.

9 **(c) Appropriately scaled site plan drawings of the proposed utility facility,**
10 **vicinity maps and routing maps. (NAC 703.423(1)(c))**

11 A site plan drawing of the Project is attached hereto as Exhibit D.

12 **2. A general description of the proposed utility facility. (NAC 703.423(2))**

13 **(a) The size and nature of the proposed utility facility. (NAC 703.423(2)(a))**

14 The Project will be built on the Nevada Uplands, a privately owned 8,600 industrial
15 property located approximately 10 miles east of Reno and three miles south of Interstate 80 in
16 Storey County, Nevada. The solar facility will consist of three phases. The Phase I solar project
17 will consist of a 100 MW/ac solar array containing ground-mounted solar PV modules, inverters,
18 transformers and a 60MW/240MW-hour BESS. The BESS will be located within the Naniwa
19 Substation, south of the Tracy Power Plant in Sparks, Nevada. An approximately 8-mile long 120-
20 kilovolt (“kv”) generation tie (“gen-tie”) transmission line will interconnect the Phase I solar
21 facilities to the point of interconnection with NV Energy at the Naniwa Substation. Another 4-
22 mile long 120 kV transmission line will run from the Naniwa Substation to the Switch Citadel
23 Campus. The transmission lines will cross privately-owned land to connect the Project to the
24 Naniwa Substation and Switch Citadel Campus. The gen-tie lines will encompass approximately
25 66 acres of land. Additional associated facilities include, but are not limited to, an operations and
26 maintenance building, maintenance and access roads and perimeter fencing.
27
28

1 Phase 2 is a 150 MW/ac solar facility to be constructed on approximately 1261 acres of
2 land. It will utilize the gen-tie constructed for Phase 1 and will have ancillary facilities similar to
3 Phase 1.

4 **(b) The natural resources that will be used during the construction and**
5 **operation of the proposed utility facility. (NAC 703.423(2)(b))**

6 Natural resources that will be used during the construction and operation of the Project
7 include cement and aggregate, water for dust suppression (estimated at 250 acre feet for
8 construction), and metals such as copper and steel.

9 **(c) Layout diagrams of the proposed utility facility and its associated**
10 **equipment. (NAC 703.423(2)(c))**

11 A layout diagram of the Project is attached hereto as Exhibit E.

12 **(d) Scaled diagrams of the structures at the proposed utility facility. (NAC**
13 **703.423(2)(d))**

14 A layout diagram of the Project is attached hereto as Exhibit E.

15 **(e) A statement concerning whether the proposed utility facility is an electric**
16 **generating plant or the associated facilities of an electric generating plant**
17 **that uses renewable energy as its primary source of energy to generate**
18 **electricity. (NAC 703.423(2)(e))**

19 The Project is an electric generating plant that will use renewable energy as its primary
20 source of energy to generate electricity.

21 **3. A copy and summary of any studies which have been made of the**
22 **environmental impact of the proposed utility facility as required by subsection**
23 **1 of NRS 704.870. (NAC 703.423(3))**

24 An Environmental Statement for the Project dated December 2019 is attached as Exhibit F
25 to the Application and is incorporated by reference into this Application.

26 **4. A description of any reasonable alternate locations for the proposed utility**
27 **facility, a description of the comparative merits or detriments of each location**
28 **submitted, and a statement of the reasons why the location is best suited for**
29 **the proposed utility facility as required by subsection 1 of NRS 704.870. (NAC**
30 **703.423(4))**

1 The purpose of the Project is to provide electricity generated from a clean, renewable
2 energy source. The Project is sited in an area with high quality solar irradiance, close to
3 transmission lines on available lands of sufficient size to accommodate a utility scale photovoltaic
4 solar project. In particular, the Project was most cost effective by being sited in close proximity
5 to a substation owned by the Project's off-taker, Switch. In addition to being proximate to the
6 Project's off-taker, the project area has a minimum of unmitigable environmental conflicts. Of the
7 alternate locations for the Project were considered including various locations in Storey and
8 surrounding counties the selected location meets the objects of Citadel to develop an appropriately-
9 sized photovoltaic solar facility in a cost-effective and timely manner utilizing proven, efficient,
10 and environmentally sound technology.
11

12 **5. A copy of the public notice of the application and proof of publication of the**
13 **public notice, as required by subsection 4 of NRS 704.870. (NAC 703.423(5))**

14 A summary of this Application has appeared in a newspaper that is published and
15 distributed in the area where the Project is planned. See Exhibit G. A copy of this Application
16 has been filed with the clerk of the local government in the area in which the Project is to be
17 located. See Exhibit H.
18

19 **6. Proof that a copy of the application or amended application has been**
20 **submitted to the Nevada State Clearinghouse within the State Department of**
21 **Conservation and Natural Resources. (NAC 703.423(6))**

22 A copy of this Application has been submitted to the Nevada State Clearinghouse within
23 the State Department of Conservation and Natural Resources. See Exhibit H.

24 **7. An explanation of the nature of the probable effect on the environment. (NAC**
25 **703.423(7))**

26 **(a) A reference to any studies described in subsection 3, if applicable. (NAC**
27 **703.423(7)(a))**
28

1 A detailed environmental analysis of the Project is contained in the Environmental
2 Statement dated December 2019 and included with this Application as Exhibit F. The
3 Environmental Statement analyzes the direct, indirect and cumulative environmental impacts from
4 the construction and operation of the Project.

5 **(b) An environmental statement that includes:**

6 **(1) The name, qualifications, professions and contact information of**
7 **each person with primary responsibility for the preparation of**
8 **the environmental statement. (NAC 703.423(7)(b)(1))**

9 An Environmental Statement was prepared to support the Application by Allied Pacific
10 Partners. The Statement of Qualifications of the persons with primary responsibility for
11 preparation of the Environmental Statement is included on page 30 of the Environmental
12 Statement, Exhibit F to this Application.

13 **(2) The name, qualifications, professions and contact information of**
14 **each person who has provided comments or input in the**
15 **preparation of the environmental statement. (NAC**
16 **703.423(7)(b)(2))**

17 A list of persons consulted in preparation of the Environmental Statement is included on
18 page 30 of the Environmental Statement, Exhibit F hereto.

19 **(3) A bibliography of materials used in the preparation of the**
20 **environmental statement. (NAC 703.423(7)(b)(3))**

21 A bibliography of materials is provided in Section 5.0 of the Environmental Statement,
22 Exhibit F to this Application.

23 **(4) A description of the following: (NAC 703. 423(7)(b)(4))**

24 **I. The environmental characteristics of the project area**
25 **existing at the time the application is filed with the**
26 **Commission.**

27 A detailed description of the environmental characteristics of the project area is provided
28 in Section 3.0 of the Environmental Statement, Exhibit F hereto.

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II. The environmental impacts that the construction and operation of the proposed utility facility will have on the project area before mitigation.

A detailed description of the environmental impacts of the project is provided in Section 3.0 of the Environmental Statement. See Exhibit F.

III. The environmental impacts that the construction and operation of the proposed utility facility will have on the project area after mitigation.

A detailed description of the mitigation and environmental protection measures that will be undertaken for the project is provided in Section 3.0 of the Environmental Statement, Exhibit F to this Application.

8. An Explanation of the Extent to Which the Proposed Utility Facility is Needed to Ensure Reliable Utility Service to Customers in this State. (NAC 703.423(8))

(a) If the proposed utility facility was approved in a resource plan or an amendment to a resource plan or an amendment to a resource plan, a reference to the previous approval by the Commission; or (NAC 703.423(8)(a))

(b) If the proposed utility facility was not approved in a resource plan or an amendment to a resource plan, a description of the extent to which the proposed utility facility will: (NAC 703.423(8)(b))

(1) Provide utility service to customers in this State. (NAC 703.423(8)(b)(1))

The Project will be instrumental in providing cost-effective and reliable power to replace electricity currently generated by fossil fuels, to the electric grid, which will serve Switch facilities located within Nevada.

(2) Enhance the reliability of utility service in this State. (NAC 703.423(8)(b)(2))

The Project will contribute to satisfaction of the need for renewable energy in Nevada by reducing the dependence on foreign energy sources and through the diversification of the State's energy portfolio.