BCSE would like to commend the New Energy Industry Task Force and its Technical Advisory Committees for their focus on the importance of clean energy sources in the state of Nevada and for continuing to consider compliance planning issues under the Clean Power Plan. As currently structured, Nevada is well-positioned to meet the Clean Power Plan targets.\(^1\)

Throughout its tenure the Task Force has offered important thought leadership on energy policy and has conducted an open and transparent stakeholder process. BCSE is encouraged that the Task Force is considering a menu of policy options to ensure a diverse set of energy resources that offer affordable, reliable clean electricity to businesses and consumers in the state.

As the Task Force concludes its meeting schedule, BCSE would like to express its support for the recommendations proposed by the Clean Energy Sources Technical Advisory Committee as a result of its last meeting. In particular, BCSE strongly supports the first recommendation, that the Nevada Division of Environmental Protection reconvene the Clean Power Plan Technical Advisory Group to assist the Division of Environmental Protection in the development of a state compliance plan. Continuing to work on a state compliance plan will ensure that Nevada is prepared to meet CPP emissions targets when and if the Supreme Court stay is lifted.

The increased deployment of energy efficiency, natural gas and renewable energy in the power and transportation systems is contributing to a significant decline in U.S. greenhouse gas emissions. Importantly, this downward trend in emissions has been occurring while the U.S. economy has been growing and wholesale and retail power prices have declined or remained flat in most of the country.

In Nevada, sustainable electricity sources including natural gas, have generated roughly 2/3 of the state’s energy every year since 2008 and the state has doubled its renewable energy generating capacity, driven by new geothermal, solar and wind capacity. Nevada is in an excellent position to continue these trends with the help of the reconstituted Clean Energy Sources Technical Advisory Committee. Its goals should include developing a state compliance plan that benefits Nevada residents and businesses, and taking advantage of programs like the Clean Energy Incentive Program (CEIP) that can spur early adoption of renewables, especially in low income communities.

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\(^1\) See the [Nevada Clean Energy Factsheet](http://www.bcse.org), which shows that Nevada needs a 22% reduction in its carbon emissions rate by 2030 under a rate-based plan, and that Nevada is already on pace to meet its 13% reduction target under a mass-based plan.
BCSE also supports the recommendation of the Distributed Energy Resources TAC to introduce a bill to include energy storage procurement targets in the Nevada code. Energy storage is a powerful tool in meeting emissions reduction and renewable energy integration goals. According to Bloomberg New Energy Finance, most activity in the non-hydropower energy storage market is policy-driven. For example, California’s 1.3GW energy storage mandate for 2015-2020 resulted in utilities soliciting for over 350MW of storage in 2014. BCSE encourages the NEITF to adopt this recommendation and send a positive policy signal to spur the energy storage market in Nevada.

The Business Council for Sustainable Energy and its members are committed to helping the state of Nevada adopt clean energy solutions for its unique circumstances and would like to continue to be a resource to the Governor’s Office of Energy and the Nevada Department of Environmental Protection after the Task Force’s process concludes.

BCSE believes the work of this Task force will be critical for identifying energy policies and frameworks that meet Nevada’s energy needs, supporting economic development, and meeting or exceeding Nevada’s climate change and Clean Power Plan objectives, and we encourage the adoption of the Subcommittee recommendations discussed above. Thank you.

Sincerely,

Lisa Jacobson
President, Business Council for Sustainable Energy