

RECEIVED NOV 16 2010 NEVADA STATE ENVIRONMENTAL COMMISSION

November 9, 2010

#### Via Email and Hard Copy

John B. Walker, Executive Secretary State of Nevada State Environmental Commission 901 South Stewart Street, Suite 4001 Carson City, Nevada 89701

Re: Petition for Leave to Intervene in Sierra Club Appeal of SNHD Approval of Application for Solid Waste Management Facility – Permit No. LF006-CMF-01

Dear Mr. Walker:

Pursuant to Nevada Administrative Code (NAC) Section 445B.8915, Nevada Power Company d/b/a NV Energy ("NV Energy") hereby petitions the State Environmental Commission (the "Commission" or "SEC") for leave to intervene in the appeal request filed with the Commission by the Sierra Club on November 6, 2010, regarding the Southern Nevada Health District's ("SNHD") approval of NV Energy's Application for Solid Waste Management Facility, Permit Number LF006-CMF-01, for the Reid Gardner Station. In support of this petition, NV Energy submits the following information in accordance with NAC 445B.8915(2):

## (a) The proceeding in which the Petitioner requests leave to intervene

NV Energy requests leave to intervene in Sierra Club's appeal of the Southern Nevada Health District's ("SNHD") approval of NV Energy's Application for Solid Waste Management Facility, Permit Number LF006-CMF-01, for the Reid Gardner Station.

### (b) The name and address of the Petitioner and the name, address and telephone number of any attorney or other authorized person representing the Petitioner

The Petitioner and its mailing address are:

Nevada Power Company d/b/a NV Energy 6226 West Sahara Ave Las Vegas, NV 89146 In this proceeding, NV Energy will be represented by the following:

Thomas Woodworth Assistant General Counsel NV Energy, Inc. 6226 West Sahara Ave, MS 03A Las Vegas, NV 89146 (702) 402-5694 twoodworth@nvenergy.com

### (c) Petitioner's interest in this proceeding

NV Energy is the applicant of the permit that is the subject of this proceeding, and therefore its interests are directly and substantially affected by the outcome of this proceeding.

# (d) The manner in which Petitioner will be affected by this proceeding

This permit, on the terms approved by the SNHD, is vitally important to the continued operation of the Reid Gardner Station. Any modification or reversal of this permit could have substantial adverse effects on the ability of NV Energy to reliably and cost-effectively operate the facility.

# (e) Whether the Petitioner intends to present evidence in this proceeding

At this time, NV Energy intends to present evidence in the proceeding.

If there are any questions, please contact me at (702) 402-5694 or via email at <u>twoodworth@nvenergy.com</u>.

Respectfully submitted,

Thomas C. Woodworth Assistant General Counsel NV Energy, Inc. 6226 West Sahara Ave, MS 03A Las Vegas, NV 89146 Tel: (702) 402-5694 twoodworth@nvenergy.com

### **CERTIFICATE OF SERVICE**

I certify that on November 9, 2010, I served a copy of the foregoing document to the following by electronic means, as well as by U.S. Mail, postage prepaid:

Dan Galpern Staff Attorney Western Environmental Law Center 1216 Lincoln Street Eugene, OR 97401 (541) 485-2471 x114 galpern@westernlaw.org \*\*Representing the Sierra Club

Thomas Woodworth