

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Joseph T. Kelliher, Chairman;  
Nora Mead Brownell, and Suedeen G. Kelly.

Nevada Power Company

Docket No. ER02-1913-006

ORDER ON REHEARING

(Issued October 4, 2005)

1. In this order, the Commission addresses Nevada Power Company's (Nevada Power) request for rehearing of the Commission's May 6, 2005 Order,<sup>1</sup> which addressed the remand by the United States Court of Appeals for the District of Columbia Circuit, *Entergy Services, Inc. v. FERC*.<sup>2</sup> In the May 6 Order, the Commission explained why our policy that network upgrades include all facilities "at" or beyond the point where the generator connects to the grid is reasonable. The Commission also explained that our decision in *Consumers Energy*<sup>3</sup> is consistent with our "at or beyond" test.

**Background**

2. In its initial filing in this proceeding, Nevada Power proposed, through an unexecuted Interconnection and Operation Agreement (Interconnection Agreement) between Nevada Power and GenWest, LLC (GenWest), to directly assign to GenWest (without credits) a radial 500 kV line from GenWest's generating facility to an interconnection with Nevada Power's transmission system at Nevada Power's Harry Allen 500 kV switchyard, the cost of a one line terminal installed to upgrade the switchyard, and certain related equipment. Nevada Power estimated the costs of these directly assigned facilities to be approximately \$6.57 million. In *Nevada Power I*, the Commission accepted the Interconnection Agreement for filing but required a revision because we found that GenWest could not be directly assigned the cost of a one line

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<sup>1</sup> *Nevada Power Co.*, 111 FERC ¶ 61,161 (2005) (May 6 Order).

<sup>2</sup> 391 F.3d 1240 (D.C. Cir. 2004) (Remand Order), *reh'g and reh'g en banc denied*, No. 02-1199 (D.C. Cir. February 11, 2005).

<sup>3</sup> *Consumers Energy Co.*, 95 FERC ¶ 61,233 (*Consumers Energy*), *reh'g denied*, 96 FERC ¶ 61,132 (2001).

terminal installed to upgrade Nevada Power's Harry Allen 500 kV switchyard.<sup>4</sup> The Commission based this decision on precedent that upgrades "at or beyond" the point where a customer connects to the grid are part of that grid, and thus cannot be directly assigned to interconnecting generators.<sup>5</sup> Therefore, the Commission found that that the one line terminal was a network upgrade for which GenWest should receive transmission service credits once it takes the delivery component of transmission service.<sup>6</sup> In *Nevada Power II*,<sup>7</sup> the Commission denied Nevada Power's request for rehearing.

#### A. Court Remand

3. Nevada Power sought judicial review, contending that the Commission's "at or beyond the point of interconnection" rule is an unjustified departure from precedent.<sup>8</sup>

4. The court remanded the order to the Commission for further explanation. It stated that *Consumers Energy* "set forth an overarching defense of at least a "from test" (i.e., all facilities from the point where the generator connects to the grid).<sup>9</sup> The court explained that its only difficulty in this case was whether "from" means "at or beyond," or merely "beyond." It stated that "the Commission's explanation in *Consumers Energy*, at least on its face, is not consistent with the Commission's application of the test to the facts before us" because *Consumers Energy* referred only to facilities "from" the point of interconnection, not "at or beyond" that point.<sup>10</sup> The court explained that it was not suggesting that the Commission could not forbid direct assignment of the costs at issue, because substantial evidence appeared to support either an "at" test or a more limited "beyond" test, "but if the Commission does so, it must provide further explanation."<sup>11</sup>

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<sup>4</sup> *Nevada Power Co.*, 100 FERC ¶ 61,077 (2002) (*Nevada Power I*).

<sup>5</sup> *Entergy Gulf States, Inc.*, 98 FERC ¶ 61,014 at 61,023, *reh'g denied*, 99 FERC ¶ 61,095 (2002) (*Entergy Gulf States*); *Tampa Electric Co.*, 99 FERC ¶ 61,192 at 61,796 (2002) (*Tampa*).

<sup>6</sup> *Nevada Power I*, 100 FERC ¶ 61,077 at P 14.

<sup>7</sup> *Nevada Power Co.*, 101 FERC ¶ 61,036 (2002) (*Nevada Power II*).

<sup>8</sup> Remand Order, 391 F.3d at 1247.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at 1251.

The court concluded that the Commission did not take account of *Consumers Energy's* discussion of facilities *at* the point of interconnection and that the “at or beyond” test appeared to be a departure from the *Consumers Energy* “from” test.<sup>12</sup>

### **B. The May 6 Order**

5. In the May 6 Order, the Commission first explained why it is reasonable to treat facilities “at” the point of interconnection as network facilities.<sup>13</sup> We explained that it would be irrational to treat a facility that is “from” the point of interconnection (that is, further *into* the network) as a network facility but not to so treat an upgrade that is “at” the point of interconnection, and thus squarely *on* the network, as are the facilities at issue here. The Commission again pointed out that the upgrades at issue here are modifications to a part of a substation that was a network facility before the interconnection of the new generator and that “upgrading that part of the substation did not somehow transform it into a non-network facility.”<sup>14</sup>

6. Next, the Commission explained why we believed that *Consumers Energy* does not contradict the “at or beyond” test. We explained that because we characterized the network upgrades in *Consumers Energy* as “all facilities from [not “at or beyond”] the point where the generator connects to the grid,”<sup>15</sup> the court in the Remand Order apparently believed that the Commission had allowed direct assignment of some network facilities. We clarified that when we first articulated the locational test for determining whether a facility is a network facility, we used the vague term “from” the point of interconnection instead of the more precise “at or beyond” the point of interconnection. However, our adoption of the clearer terminology was not a change in policy. The network begins *at* the point where the interconnection facilities connect to the transmission system, not somewhere *beyond* that point.

7. On June 6, 2005, Nevada Power filed a timely request for rehearing of the May 6 Order.

8. On September 7, 2005, Cottonwood Energy Company, LP and Tenaska, Inc. (Cottonwood) filed a motion for leave to file answer and an answer.

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<sup>12</sup> *Id.*

<sup>13</sup> May 6 Order at P 12.

<sup>14</sup> *Id.*

<sup>15</sup> *Consumers Energy*, 95 FERC at 61,804.

## **Discussion**

### **A. Procedural Matters**

9. Pursuant to Rule 713(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.713(d) (2005), answers to requests for rehearing are not permitted. Accordingly, we will reject Cottonwood's answer.

### **B. Consistency With Precedent**

#### **1. Arguments Raised on Rehearing**

10. On rehearing, Nevada Power argues that the Commission failed to engage in reasoned decision-making in answering the question remanded by the court, which Nevada Power says is whether the decision to deny direct assignment of the costs of the one line terminal was an "apparent departure" from the *Consumers Energy* decision. Nevada Power further explains that, when the court remanded the proceeding to the Commission to explain the Commission's apparent departure from precedent, the court stated that the Commission could either explain the *Consumers Energy* decision in a way that shows that the court misread that decision or explain why the Commission has departed from its precedent.<sup>16</sup> Nevada Power argues that, in choosing to respond only to the former, the Commission failed to address the concern that the decisions in *Nevada Power I* and *II* were inconsistent with the *Consumers Energy* decision. Further, it states that the Commission did not examine the type, nature, or location of the actual \$3 million in facilities that were directly assigned in *Consumers Energy*. Nevada Power states that the termination facilities that were directly assigned in *Consumers Energy* were virtually identical to the termination facilities at issue here.

11. According to Nevada Power, in *Consumers Energy*, the Commission allowed Consumers Energy to directly assign two 138 kV radial lines (costing \$1.25 million) and three circuit breakers (two breaker-and-a-half configurations for each line) that terminated those lines at the Leone switchyard (costing \$1.75 million).<sup>17</sup> Nevada Power further explains that the Harry Allen switchyard, like the Leone switchyard, was designed in a breaker-and-a-half configuration because it is a large substation with seven 500 kV

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<sup>16</sup> Remand Order, 391 F.3d at 1251.

<sup>17</sup> Nevada Power rehearing request at 5 (*citing Consumers Energy*, 95 FERC at 61,804).

lines terminating therein.<sup>18</sup> It states that the physical interconnection facilities include: (1) a 500 kV radial line; and (2) the 500 kV circuit breakers (in a breaker-and-a-half configuration), and associated equipment that terminated the radial line at the Harry Allen switchyard (one line terminal or termination facilities).<sup>19</sup> Thus, Nevada Power states that in *Nevada Power I* and *II*, the Commission upheld Nevada Power's direct assignment of the costs of the radial line, but that this was contrary to *Consumers Energy*, where the Commission denied direct assignment of the costs of the one line terminal.

## 2. Commission Determination

12. We deny Nevada Power's request for rehearing of this issue. As an initial matter, we note that contrary to Nevada Power's assertion, in the May 6 Order, the Commission not only chose to explain how the court had misread the decision in *Consumers Energy*, the Commission also explained that we had not departed from the *Consumers Energy* decision. First, the Commission explained that when we first articulated the locational test for determining whether a facility is a network facility, we used the vague term "from" the point of interconnection rather than the more precise "at or beyond" the point of interconnection used in later orders such as *Nevada Power I* and *II*. As we explained, our adoption of the clearer terminology was a more precise way of stating our precedent, rather than a departure from our precedent.

13. Although Nevada Power correctly notes that certain facilities in *Consumers Energy* that were "at" the point of interconnection were in fact directly assigned to the interconnection customer in that case, *Consumers Energy* did not hold that it was just and reasonable for the transmission owner to directly assign facilities "at" the point of interconnection to the generator; in fact, the issue was not raised, and the Commission did not discuss it or rule on it. In *Consumers Energy*, the interconnection customer agreed to the direct assignment of \$3 million of facilities, which included the three circuit breakers at the point of interconnection, and only contested the direct assignment of certain other facilities installed to remedy short-circuit and stability problems. The Commission responded to the arguments raised by the parties in that proceeding, stating that "... all network upgrade costs (the cost of all facilities from the point where the generator

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<sup>18</sup> Nevada Power rehearing request at 6, 13. Three of these lines, Nevada Power states, are integrated transmission lines, and four are radial lines that are solely used to deliver power from a specific generator to the transmission system. Each of the seven 500 kV lines require termination facilities (in breaker-and-a-half configurations) at the Harry Allen 500 kV switchyard to terminate those lines.

<sup>19</sup> In addition, Nevada Power states that other relatively minor upgrades were needed to substations located deeper into Nevada Power's transmission system as well as more significant upgrades for substations located on third party systems.

connects to the grid), including those necessary to remedy short-circuit and stability problems, should be credited back to the customer ...”<sup>20</sup> However, the direct assignment of the three circuit breakers, costing \$1.75 million, was not contested or discussed, and was thus inadvertently allowed.

14. The fact that the Commission did not focus on the direct assignment of facilities at the point of interconnection in *Consumers Energy* did not establish a policy that facilities at the point of interconnection are not network facilities. The Commission has not stated that facilities at the point of interconnection can be directly assigned. While there may have been some confusion stemming from the prior use of the phrase “from the point of interconnection,” the Commission has clearly explained that our policy is “at or beyond the point of interconnection” -- this is not a change or departure from policy, but instead a more precise way of stating it.<sup>21</sup> Therefore, any inconsistency with the facts underlying *Consumers Energy* is the result of our oversight in not observing that the transmission owner in that case was directly assigning facilities at the point of interconnection, and did not signal any change or departure in our long-standing policy. Furthermore, it is well established that the mere acceptance of an agreement for filing is not a substantive determination that the rate methodology employed is just and reasonable.<sup>22</sup>

15. In any event, as explained in the May Order and below in section D, our policy is reasonable. Thus, even if the factual findings in *Consumers Energy* were inconsistent with other applications of the “at or beyond” test, that would not invalidate use of the “at or beyond” test as a means for implementing the underlying policy.

### **C. Whether Harry Allen Substation is “At” the Point of Interconnection**

#### **1. Arguments Raised on Rehearing**

16. Nevada Power argues that the Commission’s contention that the facilities at issue here must be network upgrades because they are modifications to an existing substation does not withstand analysis. It says that the Harry Allen 500 kV switchyard was a newly-constructed substation designed to interconnect and provide transmission for new

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<sup>20</sup> *Consumers Energy*, 95 FERC at 61,804.

<sup>21</sup> See *Southern Company Services, Inc.*, 111 FERC ¶ 61,423 at PP 16-18 (2005); *Entergy Gulf States*, 99 FERC at 61,399-400.

<sup>22</sup> See *Alabama Power Co. v. FERC*, 993 F.2d 1557, 1565 n.4 (D.C. Cir. 1993) (internal quotation and citation omitted); *New York State Electric & Gas Corporation*, 87 FERC ¶ 61,049 at 61,208 (1999); 18 C.F.R. § 35.4 (2005).

generating plants located in the region. Nevada Power explains that this *new* 500 kV substation is wholly separate from the *existing* 230 kV Harry Allen substation and that the only thing the two substations have in common is their name.<sup>23</sup>

## **2. Commission Determination**

17. The Commission acknowledges that we erred in the May 6 Order in referring to the Harry Allen substation as an existing substation, rather than a newly-constructed substation, as Nevada Power points out. However, this factual distinction does not lead to a different conclusion. A switchyard looped into an existing transmission line will contain transmission level protection devices, circuit breakers and other such facilities. As Nevada Power points out, the Harry Allen 500 kV Substation was designed to interconnect new generating plants located in the region and has three integrated transmission lines and four radial generator lines that terminate there, each requiring termination facilities in breaker-and-a-half configurations.<sup>24</sup> Thus, consistent with *Public Service Company of Colorado*<sup>25</sup> and other long-standing Commission precedent, all of the switchyard is a network facility. In *Entergy Gulf States*,<sup>26</sup> we noted that our long-standing holding in *PSCO* is that the network cannot be dismembered or directly assigned and that even if a customer causes the addition of a grid facility (*i.e.*, it would not be needed “but for” the customer’s request), the addition is a system expansion used by and benefiting all users due to the integrated nature of the grid. This is true without regard to the purpose of the upgrade (*e.g.*, to relieve overloads, to remedy stability and short circuit problems, to maintain reliability, to provide protection and service restoration or to reconfigure or relocate existing facilities).<sup>27</sup>

### **D. Reasonableness of Treating Facilities at the Point of Interconnection as Network Facilities**

#### **1. Arguments Raised on Rehearing**

18. Nevada Power claims that it is perfectly logical that a modification to the transmission system *at* the border might be treated differently than a modification *deeper into* the transmission system because it is more likely that a border facility relates to elements off the transmission system. For example, it states that the termination

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<sup>23</sup> Nevada Power rehearing request at 13.

<sup>24</sup> Nevada Power rehearing request at 13.

<sup>25</sup> 62 FERC ¶ 61,013 at 61,061 (1993) (*PSCO*).

<sup>26</sup> 98 FERC at 61,023.

<sup>27</sup> *Id.*

facilities, which are located at the border of the Nevada Power transmission system, serve solely to terminate the 500 kV radial line and are, therefore, more closely related to that radial line than to the transmission system.

## 2. Commission Determination

19. We will deny rehearing on this issue. The Commission's well-established policy is that the transmission grid is a single piece of equipment – a cohesive network moving energy in bulk.<sup>28</sup> As we have explained, due to the integrated nature of the transmission grid, upgrades at or beyond the point where a customer connects to the grid benefit all users of that grid. Thus, we have rejected the direct assignment of grid facilities at or beyond the point where a customer connects to the grid. We see no justification for departing from this reasoning, as Nevada Power suggests here. Further, we note that the court in the Remand Order indicated that the “at” test was a reasonable one.<sup>29</sup>

### E. Other Arguments Against the “At or Beyond” Policy

#### 1. Arguments Raised on Rehearing

20. Nevada Power argues that the Commission's “at or beyond” test violates the Energy Policy Act of 1992, which amended section 212 of the Federal Power Act (FPA).<sup>30</sup> Nevada Power asserts that the “at or beyond” test violates the Energy Policy Act's cost causation requirement because it seeks to spread the costs of providing wholesale transmission service, including the cost of facilities required to provide interconnection service, to retail and other existing transmission customers. Further, it states that the May 6 Order violates the Energy Policy Act's requirement of efficient location of new generation because the “cost socialization” policy used by the Commission will have the exact opposite result.<sup>31</sup>

21. Finally, Nevada Power argues that because the Commission only applies this pricing policy in some areas of the country (*i.e.*, those without Regional Transmission Organizations (RTOs) or Independent System Operators (ISOs)), we unfairly

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<sup>28</sup> *PSCO*, 62 FERC at 61,061; *Tampa*, 99 FERC at 61,696.

<sup>29</sup> See Remand Order at 1251 (“[w]e do not suggest that the Commission may not directly assign the costs at issue ...”).

<sup>30</sup> Energy Policy Act of 1992 § 722 (codified at 16 U.S.C. § 824k (2000) (Energy Policy Act)).

<sup>31</sup> Nevada Power rehearing request at 21.

discriminate against consumers in those regions by requiring them to bear additional costs.<sup>32</sup> It states that the Commission's May 6 Order does not provide any rational reason for treating customers in these regions differently.

## 2. Commission Determination

22. We deny rehearing on this issue. First, we note again that the court in the Remand Order was generally amenable to the Commission's "at or beyond" pricing policy.<sup>33</sup> As the Commission has previously explained in detail, we find that the section of the FPA on which Nevada Power relies applies only to orders by which the Commission *compels* interconnection by a utility.<sup>34</sup> Thus, the section Nevada Power cites is irrelevant to this proceeding, which involves no such order. Section 212 applies only to transmission service ordered under section 211.<sup>35</sup> In reviewing Nevada Power's filing, we are acting under section 205,<sup>36</sup> not section 211. Even if section 212 applied here, the Commission's policy would not violate section 212 because it promotes economic efficiency, is just and reasonable, and is needed to prevent transmission providers that have an incentive to discourage competitors from unduly discriminating against those competitors. Moreover, we note that the legislative history of the Energy Policy Act of 1992 does not support a conclusion that section 212 was intended to require a particular type of transmission pricing.<sup>37</sup> Finally, as we discussed in Order No. 2003-A, the court in *Entergy Services*,

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<sup>32</sup> For example, Nevada Power states that, in the regions served by the PJM transmission system, the Commission concluded that it is appropriate for generators to solely bear the costs of interconnection facilities that would be "socialized" under the "at or beyond" rule. *Id.* at 22 (*citing PJM Interconnection, LLC*, 87 FERC ¶ 61,299 (1999); *Boston Edison Co.*, 98 FERC ¶ 61,200 (2002)).

<sup>33</sup> See Remand Order at 1251.

<sup>34</sup> See *Southern Company Services, Inc.*, 108 FERC ¶ 61,229 (2004), *order on reh'g*, 111 FERC ¶ 61,423 (2005); *Entergy Services, Inc.*, 111 FERC ¶ 61,181 (2005); See also *Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003-A, 69 Fed. Reg. 15,932 at P 580 (Mar. 26, 2004), FERC Stats. & Regs., ¶ 31,160 (2004) (Order No. 2003-A), *order on reh'g*, Order No. 2003-B, 109 FERC ¶ 61,287 (2004) (Order No. 2003-B); see also *Notice Clarifying Compliance Procedures*, 106 FERC ¶ 61,009 (2004). While that order does not apply to this case, the arguments Nevada Power raises were raised in the rulemaking proceeding, and the reasoning in Order No. 2003-A explains the flaws in Nevada Power's arguments on rehearing.

<sup>35</sup> 16 U.S.C. § 824j (2000).

<sup>36</sup> 16 U.S.C. § 824d (2000).

<sup>37</sup> Order No. 2003 at P 723; Order No. 2003-A at P 582-583, 612-18.

*Inc. v FERC*<sup>38</sup> clearly affirmed the Commission's reasoning underlying rolled-in transmission rates and our view that all transmission customers benefit from an expanded, and thus more reliable, transmission system.<sup>39</sup>

23. In Order No. 2003-A, the Commission also responded in detail to arguments such as the ones Nevada Power raises here concerning the importance of sending locational pricing signals to interconnecting generators. We recognized the need for such price signals, but balanced that need with the need to promote competition and infrastructure development, protect the interests of interconnection customers, and protect native load and other transmission customers. The same reasoning applies here.

24. Finally, as we explained in detail in Order No. 2003 and Order No. 2003-A, allowing an independent transmission provider to adopt a pricing policy that differs from the crediting approach that the Commission required for non-independent entities is not unduly discriminatory. Where the transmission provider is an independent entity, the Commission reasonably is much less concerned that all generation owners will not be treated comparably, because the independent transmission provider has no incentive to treat customers differently.<sup>40</sup> Thus, different treatment is fair because the two types of transmission providers are not similarly situated.

## **F. Rebuttable Presumption**

### **1. Arguments Raised on Rehearing**

25. Nevada Power asserts that, for the first time, and without adequate explanation, the Commission announced in the May 6 Order a new ruling that the "at or beyond" test creates a rebuttable presumption, rather than being absolutely dispositive. It notes that the Commission cites *Tampa* to support its contention, but argues that the *Tampa* case has never been cited for the proposition that the "at or beyond" test creates a rebuttable presumption. In contrast, Nevada Power argues that the Commission's prior orders strongly suggest that the "at or beyond" test is a bright line test in which location alone is the determinative factor.<sup>41</sup> It also argues that the Commission did not explain how the presumption works and how the presumption can be rebutted. Further, Nevada Power asserts that the Commission should give Nevada Power an opportunity to rebut the presumption with respect to the termination facilities at issue in this proceeding.

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<sup>38</sup> 319 F.3d 536 (D.C. Cir. 2003) (*Entergy*).

<sup>39</sup> *Entergy*, 319 F.3d at 543-4.

<sup>40</sup> Order No. 2003 at P 701. Order No. 2003-A at P 691 - 693.

<sup>41</sup> Nevada Power rehearing request at 17.

## 2. Commission Determination

26. We will deny Nevada Power's request for rehearing of this issue. In the May 6 Order, we stated that "the presumption that a facility at the point of interconnection to the grid is part of the grid is rebuttable."<sup>42</sup> This statement is not a new ruling. Entities have always had an option to seek waiver of Commission policy, which we have granted when there is good reason to do so<sup>43</sup> – which was true before the May 6 Order. The option to rebut a presumption in this context similarly allows an entity to prove that certain facilities are in fact not grid facilities and should be treated differently. Moreover, it is reasonable for the Commission not to specifically detail how this presumption may be rebutted. As the Commission has explained, direct assignment is allowed only for those transmission facilities that fall into what we have referred to as an "exceptional category" of facilities that are so isolated from the grid that they are and will remain non-integrated.<sup>44</sup> Thus, the Commission anticipates that there it will be very rare for facilities at or beyond the point of interconnection not to be network facilities. We cannot predict every circumstance in which that may be the case, but it is reasonable for the Commission to acknowledge the possibility that, in rare circumstances, we could waive the strictly locational "at or beyond" test. In the May 6 Order, we noted that in the *Tampa* case the Commission allowed the transmitting utility to rebut the presumption regarding metering equipment located inside the substation fence.<sup>45</sup> The Commission will leave it to parties to determine what type of evidence to present to persuade us that their facilities that are at the point of interconnection fall into this "exceptional category" of facilities and, therefore, should be treated as direct assignment facilities rather than as network upgrades. In this case, the Commission has examined Nevada Power's filing to

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<sup>42</sup> May 6 Order at P 18.

<sup>43</sup> See *City of Fremont v. FERC*, 336 F.3d 910, 917 (9<sup>th</sup> Cir. 2003) (as a general principle, "it is always within the discretion of a court or an administrative agency to relax or modify its procedural rules adopted for the orderly transaction of business before it when in a given case the ends of justice require it." (citation omitted).)

<sup>44</sup> See *PSCO* at 61,061 citing *Idaho Power Company*, 3 FERC ¶ 61,108 at pp. 61,295-96 (1978) (concerning the direct assignment of unusually long lines ranging from 67-110 miles from utility's main system).

<sup>45</sup> *Tampa*, 99 FERC at 61,796-97.

determine whether Nevada Power could rebut the presumption.<sup>46</sup> There is no convincing evidence that Nevada Power's facilities fall into the "exceptional category" of facilities that qualify as direct assignment facilities and, therefore, the presumption is not rebutted.

The Commission orders:

Nevada Power's request for rehearing is hereby denied, as discussed in the body of this order.

By the Commission.

( S E A L )

Magalie R. Salas,  
Secretary.

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<sup>46</sup> See Nevada Power rehearing request, Attachment A (Affidavit of Brian J. Whalen, Jr. at pp 6-8); See also Nevada Power January 14, 2004 compliance filing, Interconnection Agreement, Appendix A and Nevada Power May 29, 2002 filing, Interconnection Agreement, Appendix A. Herein specific information, including diagrams, were submitted describing the facilities at issue.