December 8, 2017

Dear Chair Reynolds,

I write on behalf of the Ceres BICEP Network, a coalition of major employers and large electricity customers across the United States, to express our support for strong clean energy policies in Nevada. The Ceres BICEP Network (Business for Innovative Climate and Energy Policy), includes 6 companies with a footprint in Nevada. We appreciate the opportunity to bring the corporate perspective to these issues, highlighting how strong policies and well-designed regulation can enable the cost-effective clean energy solutions that attract business and investment to the state.

These comments are intended to highlight business support for: (1) clean energy policy in Nevada; (2) an expanded Renewable Portfolio Standard (RPS) in a retail market; and (3) the multiple benefits of regionalizing the state’s energy market, in particular a regional market’s ability to integrate clean energy resources reliably and cost effectively. These items correlate with Topics (2) and (3) from the Commission’s request for comments.

Business Support for Clean Energy

BICEP members support policies that advance renewable energy, energy efficiency, and electric vehicles because these policies allow them to meet both their clean energy and their financial goals. Our members, like many leading businesses across the United States, have set ambitious climate, clean energy, and energy efficiency goals. Clean energy solutions help businesses cut energy costs, avoid the volatility of fossil fuel prices, and stay competitive. Ceres’ analysis has shown that renewable energy and energy efficiency are saving U.S. companies $3.7 billion a year, savings they can reinvest into their businesses and their communities.

Strong clean energy policies create high-paying jobs by attracting business and investment to the Nevada. As large employers and major energy consumers, our members know firsthand how energy policies impact the cost of doing business. Policies and regulations that help companies cost effectively meet their goals encourage them to allocate capital towards clean energy products, systems and services within Nevada. Utility and company investments in renewables, energy efficiency, and electric vehicles generate grid improvements and drive cost savings that can benefit all of the state’s ratepayers.
RPS in Retail Markets

Attached to these comments is a letter to the members of the Nevada State Senate supporting an increase to the state’s RPS and signed by Dignity Health, Ebay, Levi Strauss & Co., Switch, and Unilever. Companies support a strong RPS across market structures, and have advocated for increasing both RPS and community solar policies in regulated and deregulated states. These policies are proven drivers of the renewable energy deployment our companies support. Across the country, RPS policies are estimated to have generated over 200,000 jobs, $20 billion in gross domestic product in 2013, significant public health benefits and reductions in wholesale electricity prices. Many states with a retail market also have an RPS; it is significantly easier for companies bring renewables online in retail markets.

As an example, our members supported a strong RPS in Ohio, a deregulated state. Ohio’s RPS catalyzed company investment in local clean energy projects, creating savings those companies then reinvested in their businesses and communities, driving jobs and economic growth in the state. Projects included a 9.8 MW solar power system at Campbell Soup Company’s manufacturing facility in Napoleon, Ohio, whose construction created more than 200 jobs; Metzger’s Printing and Mailing’s rooftop solar installation saving the company $3,000 a month on energy bills; and Whirlpool’s installation of wind turbines at multiple manufacturing facilities throughout the state. A retail market can enhance the variety and affordability of clean energy deployment opportunities generated by an RPS, thereby attracting business and investment.

Benefits of Regionalization

Regional organization would allow for energy that is cleaner, cheaper, and more reliable. Existing regional systems have been able to cost effectively incorporate more renewable energy and to use that energy more efficiently. Regional systems allow for economies of scale that avoid redundancies in generation and transmission while improving short- and long-term reliability planning. Better planning and use of the existing transmission and generation fleet will not only enhance integration of clean energy, but also of the “non-wire” alternatives that our companies care about, including energy efficiency, demand response, and storage. Moreover, Nevada has extensive solar and geothermal resources that it could export to other states, benefiting the state’s economy while increasing clean energy supply for the regional grid.

By combining strong clean energy policies, like an increased RPS, with the benefits of regional system operation, Nevada can catalyze a robust clean energy economy that attracts investment while driving down costs and increasing reliability for all customers. On behalf of the Ceres BICEP Network, I appreciate your time and consideration. I hope you will continue to enable further investment and growth in Nevada by prioritizing clean, least-cost energy resources.

Sincerely,

Anne Kelly
Senior Director, Policy and BICEP Network, Ceres
On behalf of Ceres BICEP Network

For more information, visit the Ceres BICEP Network online
May 30, 2017

Re: Business Support for AB 206

Dear Members of the Nevada State Senate:

As major businesses and employers in Nevada, we write in support of Assembly Bill 206 (AB 206) to increase Nevada’s Renewable Portfolio Standard (RPS) to 50% by 2030. Successful companies are always looking for ways to save money, reduce risks, and plan for the future. Clean energy policies, like the RPS, help ensure all customers are able to take advantage of the benefits of having more renewable energy on the grid.

A growing number of Fortune 500 companies have set goals to reduce greenhouse gas emissions and invest in renewable energy. States with robust clean energy standards often offer more opportunities for businesses to gain access to renewable energy and can attract more corporate investments. Clean energy not only makes economic sense, but it is also the expectation of our customers, employees and investors.

Nevada’s RPS was last substantially changed in 2009 and it is time to update the standard in order to drive more clean energy investment into the state. The costs of renewable energy have fallen dramatically in recent years, creating additional incentive for clean energy investments. The current RPS allows utilities to meet a portion of their requirements through purchased and banked renewable energy credits (RECs). AB 206 will help strengthen the RPS and update it to reflect the growing importance of geothermal and energy storage technology. Storage is paramount to creating sustainable renewable energy policy that will advance green technology and protect all ratepayers from the negative effects of overproduction. This will ensure we continue to develop Nevada’s rich renewable resources, creating thousands of good Nevada jobs.

Strengthening the state’s clean energy standard will also provide businesses with the certainty and predictability we need to make long-term investments in Nevada. Clean energy investments can help businesses cut energy costs, avoid the volatility of fossil fuel prices, and stay competitive.

Thank you for your consideration, and please do not hesitate to call on us if we can provide additional information and share our experience as this important discussion progresses.

Thank you,

eBay
Dignity Health – St. Rose Dominican
Levi Strauss and Co.

Switch
Unilever

Cc:
Members of the Nevada State Assembly
Governor Brian Sandoval

For more information, please contact Alli Gold Roberts at goldroberts@ceres.org, 617-247-0700 ext. 105