



November 9, 2011

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SUBMITTED VIA U.S. MAIL AND THE INTERNET

RE: SOLAR ENERGY INDUSTRIES ASSOCIATION'S DRAFT SWEIS COMMENTS

The Solar Energy Industries Association (SEIA) and its 1,100 members appreciate the National Nuclear Security Administration (NNSA) and the Department of Energy's (DOE) efforts to support the deployment of solar energy projects. The United States has some of the richest solar resources in the world and we should not miss an opportunity to create jobs and generate clean, reliable energy with this inexhaustible, domestic resource.

Thank you for this opportunity to submit comments on the Draft Site-Wide Environmental Impact Statement for the Continued Operation of the Nevada National Security Site (NNS) and Off-Site Locations in the State of Nevada. NNSA and DOE should select the Expanded Operations Alternative because it maximizes the solar energy resources available at the NNS.

I. About SEIA

Established in 1974, SEIA is the national trade association of the U.S. solar energy industry. Through advocacy and education, SEIA is working to build a strong solar industry to power America. SEIA's 1,100 member companies represent the entire solar supply chain from utilities to developers to manufacturers and installers. More than 100,000 Americans are employed by the solar industry at over 5,000 businesses (many of them small businesses) in all 50 states.¹ In fact, the solar industry grew by 69% in the last year making it one of the fastest growing industries in the country.² Solar energy in the U.S. now exceeds 3,100 megawatts, enough to power more than 630,000 American homes.

¹ 2011 Jobs Census Topline at <http://www.thesolarfoundation.org/sites/thesolarfoundation.org/files/2011%20Jobs%20Census%20Topline%20Release%20FINAL.pdf>.

² U.S. Solar Market Insight: 2nd Quarter 2011, available at <http://www.seia.org/galleries/pdf/SMI-Q2-2011-ES.pdf>.

II. Background

SEIA greatly appreciates the National Nuclear Security Administration (NNSA) and the Department of Energy's (DOE) dedication to incorporating solar energy in all three of the alternatives the agencies analyzed in the Draft Site-Wide Environmental Impact Statement (SWEIS) for the Continued Operation of the DOE/NNSA Nevada National Security Site (NNSS) and Off-Site Locations in the State of Nevada.

Under the No Action Alternative, NNSA would continue to conduct activities related to energy conservation and supply, including renewable energy and other research and development projects. In particular, NNSA would support the development of a 240 MW commercial solar power facility and an associated transmission line in the southwest corner of the NNSS, if proposed by commercial entities.³

The Reduced Operations Alternative would have NNSA continue activities related to the supply and conservation of energy, including renewable energy, but at a reduced scale. For example, NNSA would support development of only a 100-MW commercial solar power facility.⁴

The Expanded Operations Alternative includes the level of projects and activities described in the No Action Alternative, plus additional proposed activities. One of these additional activities would be the designation of approximately 36,900 acres within another operational area in the southwest portion of the NNSS (an expansion of the 4,100-acre area under the No Action Alternative) as a Renewable Energy Zone. Additionally, NNSA would support development of several commercial solar power facilities with a maximum combined generating capacity of 1,000 MW. NNSA would also construct a 5-MW PV solar power facility at the main NNSS support area.⁵

III. NNSA and DOE Should Select the Expanded Operations Alternative

There are many opportunities for solar expansion on public lands and federal government buildings. The federal government is the largest utility customer in the U.S. with \$5.8 billion in annual electricity costs. More than 350 million square feet of federal buildings could generate approximately 2,000 MW, or enough power for 500,000 homes. Nevada, like most of the U.S.

³ 76 Fed. Reg. 45,550 (Jul. 29, 2011).

⁴ *Id.*

⁵ *Id.*

Southwest, provides a great environment for solar development due to the state's weather and its high solar insolation.

NNSA and DOE should select the Expanded Operations Alternative because it capitalizes the most on the solar energy resources available at the NNSS. An additional 1,000 MW of solar generating capacity could decrease the NNSA's electricity costs, create several thousand construction jobs, increase existing solar power capacity in the U.S., and provide clean, renewable energy to power NNSA and other on-site installations, helping the agency meet its renewable energy mandate.⁶ Nearby Nellis Air Force Base is a good example of how solar can benefit the federal government. Its 14 MW solar facility provides 25% of the base's yearly electricity needs and saves the base over \$1 million annually in reduced electricity costs.⁷

IV. Suggestions for Future Solar Development at the NNSS

SEIA recognizes that this is just an initial study, but encourages the NNSA to eventually develop a process whereby land is designated for various solar developers' use. Moreover, given that some of the land included in the various proposed alternatives is already disturbed, it is less likely to have sensitive biological features. SEIA would support a streamlined EIS process for this previously disturbed land to expedite the development of clean, renewable solar energy.

SEIA also suggests that the NNSA not stipulate a limit to the amount of megawatts of solar energy that can be generated on a given plot of land. The solar industry continues to develop utility-scale solar power plants that maximize efficient land use. This efficiency will only increase in the future. By limiting the generation capacity of a piece of land now, NNSA could unintentionally decrease the efficient use of the land in the future.

Finally, as NNSA recognizes, transmission lines are necessary to deliver solar energy generated onsite to load located elsewhere. SEIA looks forward to working with the NNSA to ensure transmission lines are sited in the most appropriate places to capitalize on efficient electricity transmission.

In conclusion, SEIA supports the Expanded Operations Alternative, and NNSA should identify it as the preferred alternative in the Final SWEIS. SEIA is eager to work with the NNSA and DOE to develop solar power projects at the NNSS.

⁶ In the *Energy Policy Act of 2005*, Congress passed a requirement that federal agencies meet a certain percentage of their electricity consumption with renewable power. Specifically, federal agencies must meet 5% of electricity demand through renewable resources in fiscal years 2010 through 2012 and 7.5% in fiscal year 2013 and each fiscal year thereafter. 42 USC § 15852. The Department of Energy has pledged to obtain 25% of its energy from renewable energy sources by 2025.

⁷ Department of Defense Strategic Sustainability Performance Plan FY 2010, page I-5.

November 9, 2011

Page 4

Thank you for your consideration of these comments.

Respectfully submitted,

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