

Sandra Fairchild

From: CRC Hoover Allocation Team <info@crchooverallocation.com>
Sent: Friday, April 25, 2014 3:04 PM
To: 'Webb, Lloyd B CLEV'
Cc: Sandra Fairchild; Carla Miguel
Subject: RE: Solicitation for Comments on Chapter 538 of NAC Proposed Revisions

The CRC has received your comments.

Lisa M. Ray
Assistant Hydropower Program Manager
Colorado River Commission of Nevada

From: Webb, Lloyd B CLEV [<mailto:LBWebb@olin.com>]
Sent: Friday, April 25, 2014 12:37 PM
To: info@crchooverallocation.com
Cc: Martin, Matt CLEV
Subject: Re: Solicitation for Comments on Chapter 538 of NAC Proposed Revisions

To the Executive Director, Colorado River Commission of Nevada:

My name is Lloyd Webb and I am the Director, Energy Procurement for Olin Corporation. Olin has an industrial facility located in the Black Mountain Industrial Complex at 350 Fourth Street, Henderson, Nevada 89015. Although our facility is not a Contractor for hydro power with the Colorado River Commission (CRC), we do purchase non-hydro power from the CRC and our electrical distribution system is connected to other industrials located in the Black Mountain Industrial Complex who do rely on hydro power from the CRC therefor we feel it is incumbent on us to provide comments to the changes proposed by the CRC to Chapter 538 of the Nevada Administrative Code (NAC). Please find below our comments:

1. **Sec. 34 NAC 538.570** – There are situations (e.g. Industrial Parks or Commercial Parks) where the meters, switches and breakers are under the command and control of the Landlord or the Operator of their electrical systems and not the Contractor. In these situations the Contractor has no legal right to comply with this Section and it is our suggestion that the Party that controls the applicable equipment contracts with the Contractors to act as their agent to meet the requirements of this Section. This requires a minor revision of this section by changing “Contractors” to “Contractors or their Agent(s)”. Under subsection 5, add language that creates a two-step process for curtailing the power supply to industrial customers. Step 1 would be to provide notice to cease consuming power and if the Contractor doesn’t comply within 24 hours then CRC will initiate Step 2 which would be to terminate the power supply. This ensures that sufficient planning takes place so an orderly shutdown can be effected without putting plant personnel or the public at risk.
2. **Sec. 36 NAC 538.610 subsection 5** – change “for 90 days” to “for 90 consecutive days”. Contractors often do multi-year outage planning where over the course of three years the aggregate of the outages may exceed 90 days. We don’t believe that reporting these types of outages over a multi-year planning horizon is the intent of this Section.

3. **Sec. 40 NAC 538.744 subsection 4** CRC establish limits to the expected obligation for Contractor to make payments to a cash working capital fund or power prepayment similar to the limits that were established for collateral as memorialized in subsection 3 of this Section.

Thank you for your consideration of the above comments

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