



SENT VIA FED-EX

December 1, 2011

Public Company Accounting Oversight Board
Office of the Secretary
1666 K Street, NW
Washington, DC 20006-2803

Re: Comments on PCAOB Rulemaking Docket Matter No. 37

Ladies and Gentlemen:

I am pleased to submit comments on the PCAOB's Concept Release on Auditor Independence and Audit Firm Rotation – more specifically, on the idea of mandatory audit firm rotation. I write as Chairman of the Audit Committee and on behalf of the Board of Directors of NV Energy, Inc., a New York Stock Exchange listed company. My views on this topic also reflect seventeen years of experience as CFO of a public company and, before that, seventeen years as an audit partner in the firm now known as Deloitte & Touche LLP.

I believe the overall quality of audits of public companies could be worsened by mandatory audit firm rotation, rather than improved. Under the proposals, sophisticated knowledge of a company acquired over time would virtually be erased every few years. That knowledge is critical to conducting a high quality audit. In my view this will increase the incidence of audit errors and other problems.

In addition, I believe that various features of the current system including audit partner rotation, limitations on non-audit services, PCAOB inspections and fully independent audit committees, when combined with employee and executive turnover at the audit firm and the company, adequately promote and protect the audit firm's independence, objectivity and skepticism.

Finally, I believe that audit committees, by their nature, clearly understand the importance of auditor independence and are in the best position to evaluate and ensure that independence. The responsibility to monitor auditor independence, performance, and rotation of audit firms should rest with the audit committee.

Thank you very much for the opportunity to comment on this important proposal.

Respectfully submitted,

A handwritten signature in cursive script that reads "Glenn C. Christenson".

Glenn C. Christenson
Chairman
NV Energy, Inc. Audit Committee