

MINUTES

of the Public Utilities Commission Agenda
held jointly at its Offices in Carson City
and Las Vegas, Nevada

Tuesday, September 16, 2025

10:00 AM

Agenda 16 - 25

Present: Chair Hayley Williamson
Commissioner Tammy Cordova
Commissioner Randy J. Brown
Assistant Commission Secretary Trisha Osborne

ITEM 1 – PUBLIC COMMENT

A

Pursuant to NRS 241.020, a period of public comment will be allowed at the beginning of the meeting and again before the adjournment of the meeting. All public comment will be limited to no more than three (3) minutes per speaker.

Comments by Lina Tanner on behalf of Clark County Department of Environment & Sustainability (Item 2B), Isaias Gallegos (Item 2B), Angel De Fazio (Item 2B), Janet Carter on behalf of Sierra Club-Toiyabe Chapter (Item 2B), Robert Garcia on behalf of Make the Road NV (Item 2B), Tony Simmons (Item 2B), Leslie Vega on behalf of PLAN (Items 2B and 2C), Christian Salmon (Item 2B), and Hector Arreola on behalf of Nevada Environmental Justice Coalition (Item 2B). See also Attachment A.

Angel De Fazio requested her comments be reflected in the meeting minutes:

“Could Tammy have made this any more utility friendly? The only good points: 1) no demand charge or increase for NSMO rate, 2) no removal of BSC for low income. Demand charges lowering bills? That’s flawed logic, being common core utility rhetoric. Penalizing RS at .18 versus RM .10 cents per kW. What? Now it’s a crime to be a single homeowner? Where is this in statute being legal? 588 to 589 are pie in the sky guestimates. Nothing to quantify this imposition of demand charge. Denial of demand charge, then they want the BSC increased from 18.5 to 24? No. Paying for construction and [inaudible] that Doug made misleading statements, and you estimate [inaudible] decision. You have no hard-core proof that this transmission line will do as it’s proposed, along with the fact the costs keep escalating. Less than two-thirds of the \$224 mil is too much. They keep pushing for solar resulting in less revenue, then they come whining they need more operating revenue. Apparently, a salary isn’t enough. They have to incentivize workers with STIPs to do their job. Is this NVE’s version of everyone gets a trophy for participation? Out of all the extravagant travel expenses, you are only disallowing 15,691 and 2,667. Flex pay has always been touted as panacea to EPP that is proving an abject failure, and now you want to recover for the poor ideology of this program? No more money. Unacceptable ROE, 93.5. ROR 7.48% not acceptable. Basically, screw their shareholders. Thank you.”

Christian Salmon requested his comments be reflected in the meeting minutes:

“I’m Christian Salmon. I’m a local resident and ratepayer property owner here in Nevada. I oppose Draft Order Dockets 25-02016 and 25-03006. Also, this should’ve been notified. We

had a notification requirement in the State of Nevada for three days and then this was dropped on us yesterday. I concur with the last comment regarding that. That is not timely. Okay, so first the daily demand charge. The daily maximum kilowatt charge penalizes brief and non-coincident residential spikes that do not drive long-term capacity costs. The Order itself says it is not time-of-use, so customers cannot reasonably plan around it. Before mandating a paradigm shift, require a 12-month shadow billing pilot, publish correlation between daily maxima and sound planning peaks, and give customers per-day max kilowatt visibility before implementation. Without that, this proposal fails the “just and reasonable” standard in NRS 704.100 and NRS 704.110. Draft Order summary pages 8 through 10. Second, the 15-minute netting. The Order defers it for Nevada Power but adopts it for Sierra’s new NEM customers while acknowledging technical feasibility concerns. If gradualism justifies deferral for one utility, it justifies deferral for the other. Interval billing requires verified AMI accuracy, clear dispute procedures, and a transparent validation of disrupted generation. Please rescind interval netting for Sierra and open a validation and technical docket maintaining monthly netting until the record is complete. Draft Order summary pages 10 through 11, rate design sections VOILA and VIIB. Third, CWIP and Greenlink. CWIP is an exception to used and useful. The draft allows 50 percent CWIP while acknowledging that prior representations and the projects were “misleading and factually inaccurate.” That calls for more caution, not less. Either deny CWIP and use AFUDC until in-service or materially limit it with milestones, quarterly reporting, and claw-backs for delays, cancellations, and impudence. NAC 704.9483(3)(b) in discretionary. Yes, actually I will be including the remainder of my oral comments and then a full expanded written comment here today. Thank you.”

ITEM 2 – COMMISSION

A 25-01018 **NEVADA POWER COMPANY** *NV ENERGY*

Application of Nevada Power Company d/b/a NV Energy for authority to establish a Wildfire Self-Insurance Policy and cost recovery to fund the Wildfire Self-Insurance Policy.

25-01019 **SIERRA PACIFIC POWER COMPANY** *NV ENERGY*

Application of Sierra Pacific Power Company d/b/a NV Energy for authority to establish a Wildfire Self-Insurance Policy and cost recovery to fund the Wildfire Self-Insurance Policy.

FOR POSSIBLE DISCUSSION/ACTION: GRANT OR DENY PETITION FOR CLARIFICATION OF THE REGULATORY OPERATIONS STAFF AS FILED OR WITH MODIFICATIONS. GRANT OR DENY PETITION FOR RECONSIDERATION OF THE BUREAU OF CONSUMER PROTECTION AS FILED OR WITH MODIFICATIONS. GRANT OR DENY PETITION FOR CLARIFICATION AND RECONSIDERATION OF NEVADA RESORT ASSOCIATION, NEVADA GOLD MINES LLC, PEPPERMILL CASINOS, INC., MGM RESORTS INTERNATIONAL, CAESARS ENTERTAINMENT SERVICES, AND SOUTHERN NEVADA GAMING GROUP AS FILED OR WITH MODIFICATIONS. GRANT OR DENY SUPPLEMENTAL PETITION FOR RECONSIDERATION OF NEVADA GOLD MINES LLC AS FILED OR WITH MODIFICATIONS. PURSUANT TO RECONSIDERATION, MODIFY OR AFFIRM ORDER ISSUED JULY 30, 2025. ORDER MAY ISSUE.

AGENDA 16-25 MINUTES

Chair Williamson provided an overview of the proposed Order submitted as part of the Commission's briefing materials.

Commissioner Cordova noted that several parties expressed concern about having sufficient time to evaluate any new information NV Energy may present and highlighted the language in paragraph 26 on page 14 of the proposed Order, which outlines the measures in place to ensure all parties have the opportunity to review the information. Commissioner Cordova stated that this is a critical issue for the State and that she appreciated Chair Williamson for continuing to move forward.

Commissioner Brown recommended modifying the proposed Order to correct "\$500" to "\$500 million" in the second to last line of paragraph 7 on page 7.

Chair Williamson moved that the Commission grant the Petitions for Clarification and Reconsideration, issue the appropriate Order, including the edit made today, and reaffirm the July 30, 2025, Order. Commissioner Cordova seconded the motion. Motion passed unanimously (3-0).

**B 25-02016 NEVADA POWER COMPANY
NV ENERGY**

Application of Nevada Power Company d/b/a NV Energy for authority to adjust its annual revenue requirement for general rates charged to all classes of electric customers and for relief properly related thereto.

**25-03006 SIERRA PACIFIC POWER COMPANY
NV ENERGY**

Application of Sierra Pacific Power Company d/b/a NV Energy, filed under Advice Letter No. 680-E, to implement Net Metering Rider-2025 Schedule No. NMR-2025 and to close Net Metering Rider-405 Schedule No. NMR-405 to new customers.

FOR POSSIBLE DISCUSSION/ACTION: ACCEPT OR REJECT PHASE 1 STIPULATION IN DOCKET 25-02016. GRANT OR DENY APPLICATIONS AS FILED OR WITH MODIFICATIONS. ORDER MAY ISSUE.

Commissioner Cordova provided an overview of the proposed Order submitted as part of the Commission's briefing materials and apologized for the late filing of the proposed Order. Commissioner Cordova also noted that the consumer session to be held in Clark County will be rescheduled. Commissioner Cordova thanked the docket participants for their involvement and stated that the goal was to ensure that customers pay for the cost of service that is provided to them.

Commissioner Cordova modified the last line in paragraph 179 on page 50 of the proposed Order to include "LTIP."

Commissioner Cordova moved that the Commission accept the Phase 1 Stipulation in Docket No. 25-02016 and grant the Applications as modified by the proposed Order, with the correction made on the record. Chair Williamson seconded the motion. Motion passed unanimously (3-0).

C 25-02032 **NEVADA POWER COMPANY**
NV ENERGY
SIERRA PACIFIC POWER COMPANY
NV ENERGY

Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of the cost recovery of the regulatory assets relating to the development and implementation of their Joint Natural Disaster Protection Plan.

FOR POSSIBLE DISCUSSION/ACTION: GRANT OR DENY JOINT APPLICATION AS FILED OR WITH MODIFICATIONS. ORDER MAY ISSUE.

Chair Williamson provided an overview of the proposed Order submitted as part of the Commission's briefing materials.

Chair Williamson moved that the Commission grant the Joint Application as delineated in the Order and issue the appropriate Order. Commissioner Brown seconded the motion. Motion passed unanimously (3-0).

ITEM 3 – PUBLIC COMMENT

A

Pursuant to NRS 241.020, a period of public comment will be allowed at the beginning of the meeting and again before the adjournment of the meeting. All public comment will be limited to no more than three (3) minutes per speaker.

Comments by Angel De Fazio, Tony Simmons, and Christian Salmon. See also Attachment A.

Meeting adjourned.

ATTACHMENT A

Trisha Osborne

From: Anna F. Miller
Sent: Monday, September 15, 2025 8:43 AM
To: BPA
Subject: FW: Public Utilities Commission of Nevada Agenda 16-25-Continued
Attachments: Nevada Solar Res 2025 AJN final 9-13-2025 AJN.pdf

Forwarding to BPS.
Thank you.

Anna Miller
Administrative Assistant III



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From: ALAN NICHOLS <anichols6330@gmail.com>
Sent: Sunday, September 14, 2025 3:02 PM
To: Anna F. Miller <afmiller@puc.nv.gov>
Subject: Re: Public Utilities Commission of Nevada Agenda 16-25-Continued

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello Anna,
Thank you for the link to send my paper.
I will send the PDF today. If there is a problem with the file size, I can send it via FTP instead.
Have a good day.
Alan Nichols

ALAN NICHOLS
Phone: 1-775-502-6811
www.Gogreenlocally.org
My EMAIL: ANICHOLS6330@GMAIL.COM

On Fri, Sep 12, 2025 at 12:59 PM Anna F. Miller <afmiller@puc.nv.gov> wrote:

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Anna Miller, Administrative Assistant III

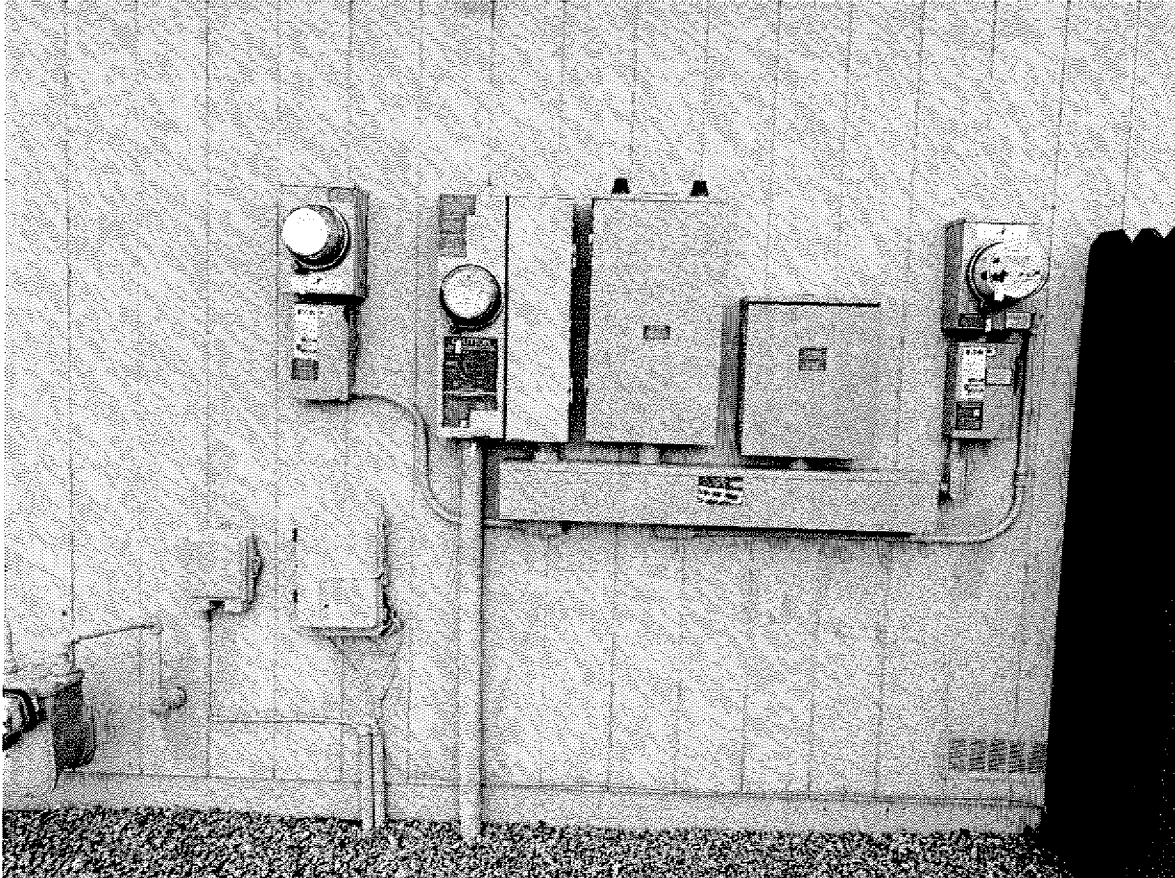
Public Utilities Commission of Nevada
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The Nevada Electric Grid Change from 2025 for Future Electrical Loads for Residential and Business Customers.

Alan Nichols, September 2025 for Nevada Public Utilities Commission NRS 241.029 September 16, 2025.



RESIDENTIAL SOLAR IN WASHOE COUNTY 2019-2025

What we expected Solar to accomplish from 2016 to 2025.

The Following information points to a deeper vulnerability: We are still running the electric grid with tools and assumptions built for a different era, one with fewer storms, slower load growth, and no massive data centers.

Using my education from engineering schools in Germany, England, Canada, and New Jersey, plus employment as a Staff Engineer for the Province of Ontario, Canada, and the Lead Satellite Uplink engineer for the AT&T DirecTV uplink system, and teaching

Satellite Modulation in Castle Rock, Colorado, and Tucson, Arizona, for AT&T engineers. This helped me to oversee the Tesla Solar System design for our residence.

My first Solar Energy Book was written by Farrington Daniels and published by Yale University in 1964. In chapter 16 on page 207, photovoltaic transfer from sunlight to electricity was explained by Pearson, Chapin, and Trivich. Chapter 16 references were the basis of the design of our rooftop Photovoltaic cells, the battery, the inverter, and the transfer switch we had Tesla install.

The calculations of this Solar system were explained in the Washoe County permit application, and the schematics were included with the plot plan.

Our electric invoices in 2016 varied from \$81.78 to \$168.16 for each month in the range of 44,299 kWh. We waited one year for the Tesla Powerwall II due to the Children's Hospital in Puerto Rico, which did not have battery storage to maintain the only electricity they could have from the Solar panels.

When Tesla installed Powerwall II, our electric invoices ranged from \$15.34 to \$65.06. In 2019, after three months of selling excess energy to our local utility, the monthly cost changed from \$15 to \$16 per month.

From 2019 to 2024, our annual cost for electricity varied from \$1300.00 to \$1500.00 per year.

The six problems we discovered with the Tesla Solar System Installation.

- 1- The bird guard we paid for was missing from the top row of solar panels. Tesla wanted \$2,500.00 to add the missing panel edge and clean up the bird poop. We added a four-inch screen to all sides of the PV array at our cost.
- 2- One of the Tesla software updates to our Powerwall II shut down the control circuit. Tesla replaced our Powerwall II in 2022.
- 3- Missing Breakers and Tesla installed Cat-5 failed. The lack of an Electrical Inspection did not catch the missing breakers. The inspector from the Fire Department verified all the Red stickers on the manual disconnect switches. The two sets of Tesla drawings (JB-8941260-00) we have are from 12-20-2018 by Hendrik Van Veen, which show 3 sets of two-pole breakers labeled 30A/2P Dryer, 50A/2P Range backed up at Design, and 30A/2P AC Unit Not backed up at Design. (JB-8941257-00) By Amelioa Brycela 9-11-2018 without Powerwall II. We contacted Tesla support, who told us to contact a local electrical contractor. We paid the licensed electrical Contractor to add two missing breakers for the Electric Stove socket and Electric Dryer socket, and we replaced the faulty Cat-5 Ethernet cable with a Cat-7 Premade. We have AT&T fiber optic to our managed Ethernet switch

and see 900 Mbps up and down to the Powerwall and all other Ethernet connections.

- 4- 2025 NV Energy statements started with \$106.22 for Jan, \$97.33 for Feb, \$80.87 for Mar, and \$55.89 for Apr, plus two of our Net Metering meters were omitted from all of these monthly statements. The local news had a story about NV Energy overcharging \$17 million.
- 5- (ROI) Return on Investment for our Tesla Residential Solar System. From 2018 w/o Powerwall II, we saved \$500.00; from 2019 to 2024, we saved \$1300 to \$1500 each year for a total payback on our investment of \$8,901.00 for eight years. At the NV ENERGY old rate of (ROI) return on investment, we will recoup our total investment in Solar in under twenty years, which is the end of the warranty of the Tesla equipment investment. From 2022 to 2032, we should be covered on the Powerwall II replacement, if Tesla is still in the Solar business. With the new 12-20% rate increase from NV Energy, our (ROI) will take some unknown additional years if the NPUC does not control the Nevada utility increase rate.
- 6- My three-minute talk for the WCC on June 30, 2025, is on " How does Solar affect our state, which has a Utility owned by Warren Buffett?
 - 1- NV Energy has some of the highest-paid management in its industry.
 - 2- NV Energy was caught overcharging its customers and not reimbursing them.
 - 3- Doug Cannon, the former President and CEO of NV Energy, resigned from his position in May 2025. This departure came during a regulatory investigation by the Public Utilities Commission of our state for allegations that NV Energy overcharged thousands of its customers. Specifically, this investigation revealed: NV Energy overcharged tens of thousands of residential customers by at least \$17 million between 2017 and 2024, possibly dating back to 2001. This was due to misclassifying multi-family residences as single-family homes. NV Energy allegedly limited refunds to affected customers using an inappropriate rule, issuing only less than \$2 million in refunds. The PUCN is currently investigating whether NV Energy violated regulations and if full refunds are necessary for affected customers. Cannon's resignation was seen by some advocacy groups as a first step towards accountability and systemic reform within NV Energy.
 - 4- Governor Brian Sandoval's PUC eliminated the state's net metering policy for rooftop solar on December 22, 2015. This decision significantly reduced the compensation solar customers received for sending excess electricity back to the grid, making rooftop solar less economically attractive and leading to job losses in our Solar industry. While not a complete "ban," this change had a significant negative impact on the solar industry in our state. However, it's

important to note that Governor Sandoval signed a law in June 2017 that helped revive the rooftop solar industry in our state by restoring elements of the net metering program. Tesla Solar came back to our state in 2017. (2:51 minutes)

- 5- From 2016 to 2025, NV Energy outages have increased from one hour and thirty-three minutes to nineteen hours at my home in Sun Valley. The Tesla App has recorded all these residential outages.
- 6- NV Energy purchases natural Gas from Occidental Petroleum in Texas, which is owned by Warren Buffett.
- 7- NV Energy has contracted for two Gas Peaker plants in Clark County that take longer to bring online than Solar panels with Lithium Battery storage. NV ENERGY did not buy US solar panels from Georgia, and US Lithium batteries made in our state.
- 8- In 2025, the MIT Fusion/Liquid Salt Reactor will provide unlimited energy with zero environmental damage. Bill Gates has funded this Washington State project that he expects to come online in 2026.
- 9- The demand for Energy from our state homeowners and business owners is substantially increasing in 2025. Data center business loads are the unknown load to be concerned about due to the potential loss of Lake Mead Hydro. The Nevada State Electric Grid Planning is insufficient to guarantee the reliable future of Electric Service in our state. Electric Trains are now in service in California, and high-speed Amtrak trains are running in 2025.

10-If our state no longer has competitive energy options, then businesses in Nevada will be outbid due to the cost of electricity. (4:10 minutes)

What do we need for our Residential solar system's sustainability in the years ahead?

- 1- NV Energy Outages have increased dramatically from a few seconds in 2019 to eleven hours in 2024 and 2025. The cause of the outages is the data center's fast on-and-off loads, and utility poles collapsing from more than 60 MPH winds. Gas Peaker plants will not provide the backup for Data Centers, and thus, Residential and small business customers will need a backup option.
- 2- Utility Electric billing changes that are not approved by the NPUC require legal consequences.
- 3- Our State will need certified courses for training solar install and repair technicians in Clark and Washoe County by our new vocational schools.
- 4- The use of Homeowner and small business off-grid backup camping generation Solar systems is now a reality that should not be ignored by the NPUC.

Record of NV Energy Outages for [REDACTED]

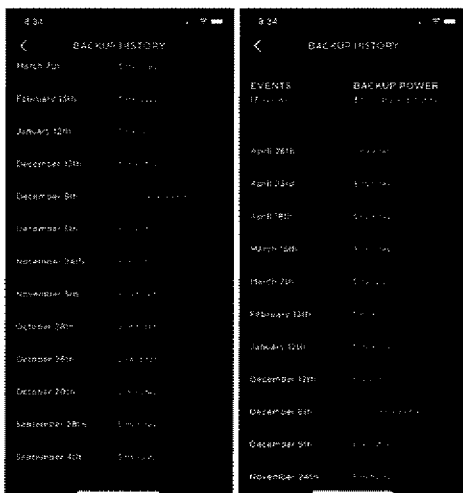
NV ENERGY POWER OUTAGES HAVE BEEN NINE TO ONE HOUR AND THIRTY-THREE MINUTES DURATION. IN THE SIX YEARS WE HAVE LOST POWER ONCE TO OUR THREE REFRIGERATORS AND ONE FREEZER. OUR TWO COMPUTER WORKSTATIONS AND TELEVISION SYSTEM ALL HAVE UPS UNITS TO PREVENT UTILITY POWER SURGES FROM DAMAGING THEM. BEFORE THE UPS UNITS, TWO FLAT SCREENS FAILED AFTER POWER SURGES.

Tesla Backup data from their App from 2019 to 2025.

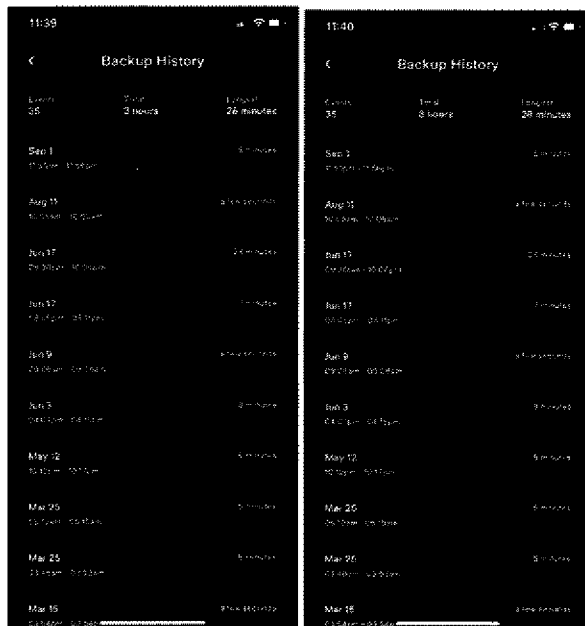
2017 Photos of Tesla App



2020 Photos of Tesla App



2021 Photos of Tesla App



2022 Photos of Tesla App

2025 Photos of Tesla App



Outage Data from Tesla Monitoring App.

TESLA SOFTWARE OUTAGES OF NV ENERGY GRID 2018-2025			BY RECORDS FROM TESLA		
2019	4 Sep 7:52 PM-07:53 PM	5 MIN	2020	07 Jan 11:59 AM-12:04 PM	5 MIN
2019	28 Sep 04:06 PM-04:12 PM	5 MIN	2020	13 Feb 04:24 PM-04:29 PM	5 MIN
2019	22 Oct 10:59-11:34 PM	6 MIN	2020	7 Mar 07:11 AM-07:16 AM	5 MIN
2019	26 Oct 11:25 AM-11:25	FEW SEC	2020	15 Mar 05:26 AM-05:31 AM	5 MIN
2019	3 Nov 06:25 AM-09:02 AM	5 MIN	2020	15 Apr 17:25 AM-07:31 AM	5 MIN
2019	24 Nov 20:22 PM-20:56 PM	5 MIN	2020	23 Apr 05:20 PM-05:35 PM	5 MIN
2019	6 Dec 02:03 AM-02:04 AM	5 MIN	2020	23 Apr 12:21 PM-12:25 PM	7 MIN
2019	12 Dec 12:03 PM-12:16 PM	5 MIN	2020	23 May 01:47 AM-07:47 AM	FEW SEC
			2020	25 May 29:26 PM-09:31 PM	5 MIN
			2020	30 May 01:30 PM-04:50 PM	FEW SEC
			2020	30 May 05:26 PM-05:26 PM	FEW SEC
			2020	15 Jun 04:00 PM-04:05 PM	5 MIN
			2020	26 Jun 05:54 PM-05:02 PM	6 MIN
			2020	24 Aug 07:42 AM-07:42 AM	FEW SEC
			2020	25 Aug 01:17 PM-01:25 PM	9 MIN
			2020	21 Sep 05:28 AM-05:36 AM	FEW SEC
			2020	21 Sep 9:55 AM-9:55 AM	FEW SEC
			2020	10 Oct 12:17 AM-12:22 AM	5 MIN
			2020	8 Nov 12:25 AM-12:30 AM	5 MIN
			2020	12 Nov 10:45 AM-10:52 AM	7 MIN
			2020	17 Nov 09:14 PM-09:20 PM	6 MIN
			2020	18 Nov 02:14 AM-02:17 AM	5 MIN
			2020	2 Dec 05:25 AM-06:29 AM	FEW SEC
			2021	28 Jan 12:05 PM-12:10 PM	10 MIN
			2021	13 Mar 03:34 PM-03:34 PM	FEW SEC
			2021	29 Mar 05:10 AM-05:15 AM	5 MIN
			2021	12 May 10:12 PM-10:17 PM	5 MIN
			2021	3 Jun 04:07 PM-04:13 PM	5 MIN
			2021	9 Jun 08:36 AM-09:02 AM	FEW SEC
			2021	17 Jun 00:29 PM-00:13 PM	7 MIN
			2021	17 Jun 09:28 PM-12:05 PM	25 MIN
			2021	1 Sep 11:51 PM-12:55 PM	5 MIN
			2021	8 Oct 04:26 AM-04:31 AM	5 MIN
			2021	21 Dec 07:30 PM-12:37 PM	5 MIN
			2021	24 Dec 10:12 AM-10:13 AM	FEW SEC
			2022	10 Aug 03:32 PM-03:43 PM	5 MIN
			2022	23 Dec 10:45 AM-10:51 AM	5 MIN
			2022	31 Dec 12:04 PM-12:09 PM	5 MIN
			2022	31 Dec 03:27 PM-03:32 PM	5 MIN
			2022	31 Dec 03:13 PM-03:18 PM	5 MIN
			2022	31 Dec 07:17 PM-07:18 PM	5 MIN
			2022	21 Dec 07:19 PM-07:24 PM	5 MIN
			2022	31 Dec 03:34 PM-03:39 PM	5 MIN
			2024	6 Jan 10:23 AM-10:25 AM	5 MIN
			2024	2 Mar 05:33 AM-05:36 AM	6 MIN
			2024	19 Jun 06:25 PM-06:31 PM	7 MIN
			2024	4 Aug 05:17 PM-05:55 PM	2 HOURS
			2024	3 Dec 10:15 AM-01:25 PM	3 HOURS
			2024	16 Dec 04:24 PM-01:02 PM	5 HOURS
			2024	23 Dec 10:22 AM-10:27 AM	5 MIN
			2025	19 Jan 05:15 PM-07:05 PM	2 HOURS
			2025	10 Jun 07:40 PM-07:11 AM	5 HOURS
			2025	28 Jun 06:21 PM-06:26 PM	5 MIN

In 2019, there were seven, 5-6 minute outages and one, a few-second outage.

In 2020, there were sixteen, 5-9 minute outages and six, a few-second outages.

In 2021, there were nine, 5-28 minute outages and three, a few-second outages.

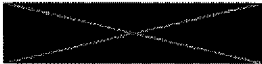
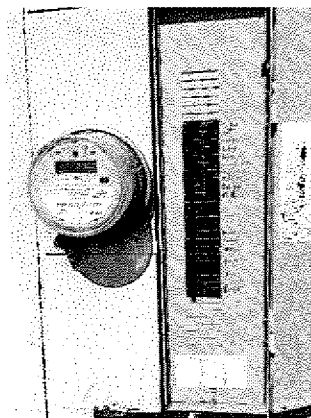
In 2022, there were eight, 5-7 minute outages and no few-second outages.

In 2023, there were four 5-minute outages and no 1-second outages.

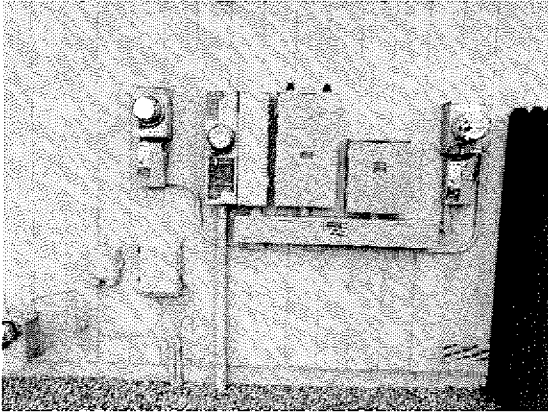
In 2024, there were four, 5–7-minute outages and one 9-hour outage.

In 2025, there was one 5-minute outage and two outages of 2 hours and 8 hours.

Three Electric Meters a [REDACTED] July 2025

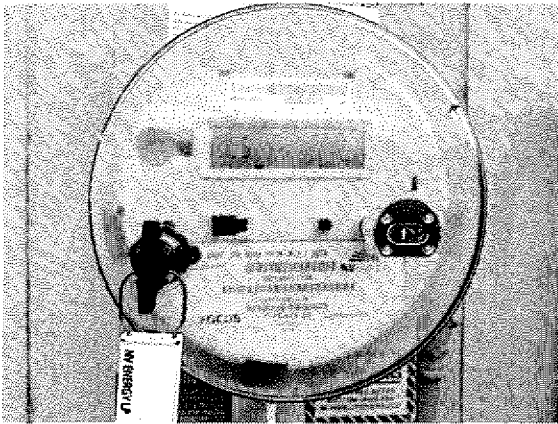


original NV Energy electric meter

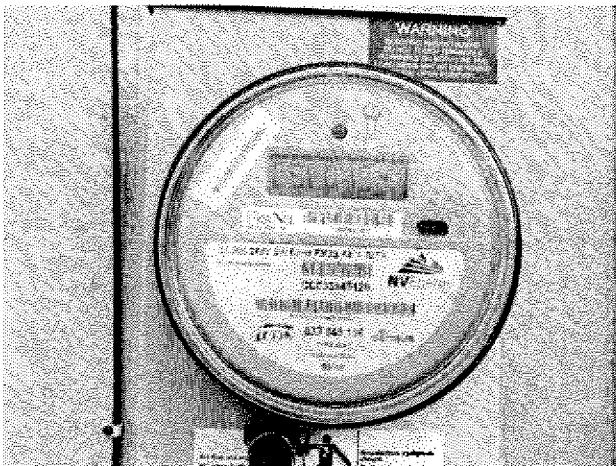


In 2020, after Tesla Powerwall II was installed, three new meters were also installed.

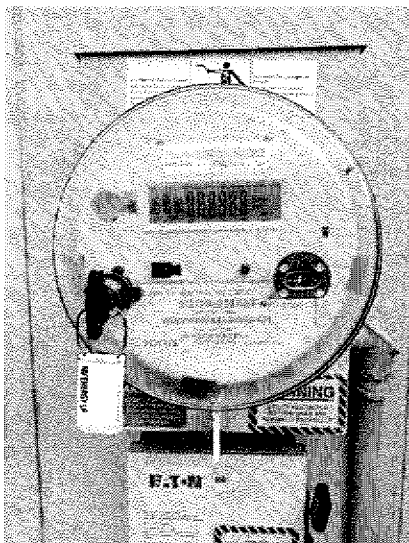
PV panel meter right



Powerwall system center meter



NV Energy Main Panel, left side of the photo of three meters



NV Energy Billing Statements show two meters from January 2025 to July 2025.

NV Energy.  PAGE 1 OF 2

Electric Usage: RES - NET ESD NMR 405

Average Daily Electric Usage

This Month: 20
Previous Month: 21.6
Difference: -8.1%
Usage in total electric kilowatt hours: 18 kWh

Usage in total electric kilowatt hours

■ Domestic ■ Industrial

Account Summary

Amount Due By: Feb 24, 2025

\$158.89

Billing Date: Feb 06, 2025
Next Read Date: Mar 03, 2025

Account Summary

Item	Amount
Previous Account Balance	\$164.82
Payment - Jan 23, 2025	\$164.82 CR
Electric Charges	\$97.22
Gas Charges	\$61.67
Current Amount Due	\$158.89

Important Messages

Thank you for choosing net metering. If you have any questions about your bill, our customer service representatives are here to help. Please call us at (775) 834-3620, Monday through Friday between 8am - 5pm or email netmeter@nvergy.com.

Thank you for maintaining an excellent payment record. We look forward to serving you in the future.

Charge Details

Item	Amount
Electric Consumption	\$70.35
Time-of-Day Pricing	\$2.50
Renewable Energy Program	\$4.96
Energy Efficiency Charge	\$1.45
Net Meter Production Plan	\$1.25

Customer Service: (775) 834-4444 or (800) 842-4399 Toll Free 24/7, excluding holidays. Emergencies: (775) 834-4160
Para servicio en español: (775) 834-4706 TDD: TTY: 711. Hearing impaired service available 24/7 days a week.

NV Energy.
PO Box 30073
Reno, NV 89520

Thank you for being a responsible customer.

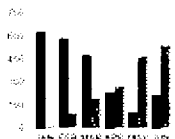
Amount Due By: Feb 24, 2025
\$158.89

Do Not Send Payment

NV Energy Billing Statements show two meters as of February 2025.



E AQ71007

Electric Usage: RES - NET ESD NMR-405				Amount Due By: Jul 23, 2025	
Average Daily Electric Usage		Usage in total electric kilowatt hours			
This Month		■ Delivered kWh ■ Received kWh			
Days Billed	32				
Delivered per Day kWh	6.7				
Received per Day kWh	16.7				
Cost per Day	\$0.61				
Generation per Day	58 kWh				
Excess Energy Credits					
The NRE 30% excess energy credit is calculated by using your 30% percent reduction to the sum of three components: BTM, BTER and DEM and then round to 5 digits for the final credit. To calculate the total percentage electricity rate please see the most recent statement of rates including a constant rate table.					
Carryover previous balance	\$38.91 CR				
Earned this billing period	\$33.33 CR				
Applied to the current bill charges	\$1.53 CR				
Carryover current balance	\$70.71 CR				
Excess Energy Credit		kWh	Rate	Credit Amount	
Accumulated Consumption		\$23.0000	0.1031900 CR	\$33.33 CR	
Meter Information					
If NV Energy is unable to read your meter because of circumstances beyond control, you may be billed based on estimated usage for that billing period.					
Type	Service Period	Bill Days	Previous Read	Current Read	Mult. Usage
KWH0	05/30/25 to 07/01/25	32	32.820	33.034	1 214
KWHR	05/30/25 to 07/01/25	32	28.526	29.066	1 534
KWHN	05/30/25 to 07/01/25	32	364	323	1 323
KWHN	05/30/25 to 07/01/25	32	15.164	15.167	1 1
KWTR	05/30/25 to 07/01/25	32	26.073	26.607	1 534
Continued on next page					
Customer Service: (775) 834-4444 or (800) 962-6399 Toll Free 24/7, excluding holidays. Emergencies: (775) 834-4100 Para servicio en español (775) 834-4700. TDD/TTY: 711. Hearing impaired service available 24/7 days a week.					

NV Energy Billing Statements show two meters as of July 2025.

Missing meter  on the NV ENERGY Statement?

Electric Usage: RES - NET ESD NMR-405

Type	Service Period	Bill Days	Previous Read	Current Read	Mult.	Usage
KWHG	05/30/25 to 07/01/25	32	59,886	61,138	1	1,222
Meter Number: [REDACTED]						
KWC	05/30/25 to 07/01/25	32	10,762	11,015	1	253
KWDC	05/30/25 to 07/01/25	32	8,976	9,264	1	228

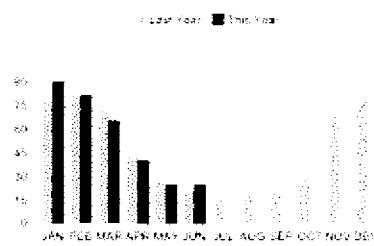
Charge Details

Electric Consumption	3,000	kWh x	0.10996	\$0.33
Excess Energy Credit Carryover				\$1.53 CR
Deferred Energy Adjustment	3,000	kWh x	0.00500 CR	\$0.32 CR
Temp. Green Power Financing	214,000	kWh x	0.00332	\$0.97
Renewable Energy Program	214,000	kWh x	0.00369	\$0.19
Energy Efficiency Charge	214,000	kWh x	0.00232	\$0.50
Natural Disaster Protection Plan	214,000	kWh x	0.00207	\$0.44
Basic Service Charge				\$18.50
Local Government Fee			5%	\$0.92
Universal Energy Charge	214,000	kWh x	0.00039	\$0.08

Total Electric Service Amount**\$19.48****Gas Usage: RESIDENTIAL NATURAL GAS SERVICE****Average Daily Gas Usage**

Last Year	vs.	This Month
32	Days Billed	32
0.6	Therms per Day	0.8
Cost per day this month: \$0.85		

Your average daily gas consumption is **MORE** this month compared to last year.

Usage in total gas therms**Meter Information**

If NV Energy is unable to read your meter because of circumstances beyond control, you may be billed based on estimated usage for that billing period.

Service Period	Bill Days	Previous Read	Current Read	Mult.	BTU Factor	Pressure Factor	Usage
[REDACTED]							

Continued on next page

Online at nvenergy.com or call (844) 343-3718

At any of our authorized Shop & Pay locations

By phone: (800) 809-1013 (debit/credit card)

By mail: P.O. Box 35073, Reno, NV 89520-3573

Energy Saving Tips**Be Smart. Save Energy.**

In warm months, set the thermostat between 78 to 80 degrees when home and 5 to 10 degrees warmer at night or when you are not home.

In cold months, set the thermostat to 68 degrees when home, and then back to 55 to 65 degrees when unoccupied.



Unplug your televisions while on vacation. Most new sets draw power even when turned off.

Install electrical outlet and switch plate insulation.



Vacuum your refrigerator coils underneath and in the back. Check that no obstructions are present as the coils need air space to work.

Make sure food is cooled and covered before it goes into the refrigerator.



Turn off lights, appliances and electronics such as a computer when not in use.

Use LED bulbs instead of incandescent ones. Regular bulbs use most of the electricity to generate heat, so use care when changing bulbs.

UNABLE TO READ?

After downloading the Tesla monitoring App data from 2019 to 2025, it clearly shows a decrease in Electric Service Reliability. The Tesla data shows a few seconds to 10 hours of outages per day.

We added four APC UPS battery systems to protect our computers and flat screens from the few-second outages from the electric grid since 2015.

The nine-hour outage in 2024 was the first time we had no power in the house.

Docket No. 25-03006 PROCEDURAL ORDER NO. 11

What we expected from our State to Legally Support Solar design and Installation business, plus regulate a Private Utility Company to protect our (ROI) Return on Investment for our Residential Solar System that actually has returned technically correct AC energy to the grid, and protecting our handicapped occupants.

What does the term sovereignty mean in politics?

In political theory, sovereignty denotes the ultimate authority within a state for decision-making and maintaining order. It is one of the most debated concepts in political science and international law, closely tied to the ideas of state, government, independence, and democracy. Derived from the Latin *superius*, meaning supreme power, the term's practical application often diverges from this original meaning.

I have studied Philosophy at Jesuit University when I was employed by IBM, plus studied contract law, Mathematics, and Electrical Engineering.

How did the concept of sovereignty evolve?

The concept of sovereignty evolved significantly from the 16th to the 20th century. Jean Bodin used it to strengthen the French king's power, while Thomas Hobbes argued for an ultimate authority in every state. John Locke and Jean-Jacques Rousseau introduced popular sovereignty, influencing the American Declaration of Independence.

PHILOSOPHIES

French Political Philosophers, Rousseau, Voltaire, Diderot, and Raynal



The French Political Philosophers and how they are important for politics in the USA.

Rousseau, Jean-Jacques

“Natural differences among people don’t underpin or explain the kinds of inequalities and hierarchies that we find in human society.”

The inequalities we find in modern societies are rooted in our beliefs, expectations, agreements, and what we’re prepared to tolerate in others. Rousseau wasn’t necessarily hostile to all of those inequalities, but he thought that inequalities by the convention ought to work to the benefit of everyone. The inequalities that we find in society—the difference between the one percent and the many—are not inequalities of the conventional type that can be justified by appealing to everyone’s benefit. Manifestly, many people are at the bottom of those hierarchies, who lose self-respect, who lack adequate means to feed themselves, clothe themselves, and so on.

Rousseau says, right at the beginning of the *Discourse on the Origin of Inequality*, that it would be impossible to find out the truth of what this history is. All we can do is read this history like present-day humans and ask how we got there. But the original human nature that lies in our distant past is obscured. He has this idea, this picture of a statue: the statue might depict our original human nature, but it’s been eroded by the sea, by the wind. Its features are no longer legible.

What would Rousseau say to the population of the United States of America today?

Would he say that Americans should look to the past ideals and behavior of the United States in the good times of peace and also the difficult times of war and conflict to highlight the best parts of American Human Behavior to use as examples for the people of the United States to follow today?

What’s important about Rousseau? Why should we care about him and his works today?

Rousseau transformed our understanding of many aspects of life. Three or four years ago, the French magazine *Le Nouvel Observateur* produced a special edition on Rousseau, and on the front cover, it made the following claims for Rousseau: he invented the child, nature, equality, democracy, and the cult of the self. Those are big claims for Rousseau, but they’re not entirely crazy. He made a difference in how we think about all of those things: about our subjectivity, about politics, about equality. For the range of contribution and impact on Western intellectual culture, Rousseau is a big figure. He’s still a big figure, more than 300 years after his birth.

Here are some of Rousseau’s points.

The first chapter opens with the famous phrase: “Man was born free, and he is everywhere in chains.” These “chains” are the constraints placed on the freedom of citizens in modern states. The stated aim of this book is to determine whether there can be a legitimate political authority—whether a state can exist that upholds, rather than constraints, liberty.

Rousseau rejects the idea that legitimate political authority is found in nature. The only natural form of authority is the authority a father has over a child, which exists only for the preservation of the child. Political thinkers--particularly Grotius and Hobbes have asserted that the relationship between ruler and subject is similar to that between father and child: the ruler cares for his subjects and so has unlimited rights over them. This kind of reasoning assumes the natural superiority of rulers over the ruled. Such superiority is perpetuated by force, not by nature, so political authority has no basis in nature.

Nor is legitimate political authority founded on force. The maxim that "might makes right" does not imply that the less strong should be obedient to the strong. If might is the only determinant of right, then people obey rulers not because they should, but because they have no choice. And if they can overthrow their ruler, then this is also right since they are exercising their superior might. In such circumstances, there is no political authority; people simply do whatever is within their power.

Rousseau's suggested answer is that legitimate political authority rests on a covenant (a "social contract") forged between the members of society. He has several predecessors in theorizing a social contract, including Grotius, who proposes that there is a covenant between the king and his people--a "right of slavery"-- where the people agree to surrender their freedom to the king. Grotius is less clear about what the people get in return for their freedom. It is not preservation: the king keeps himself fed and contented off the labor of the people, and not the other way around. It is not security: civil peace is of little value if the king makes his people go to war, and desolates the country by stockpiling all its goods for his consumption. Yet it must be something because only a lunatic would give up his freedom for nothing, and a covenant made by a lunatic would be void. Besides, even if people were able to surrender their freedom, they could not justifiably surrender the freedom of their children as well.

It is impossible to surrender one's freedom in a fair exchange. By surrendering their freedom to their ruler, people surrender all their rights and are no longer in any position to ask for something in return. More importantly, Rousseau links freedom with moral significance: our actions can only be moral if those actions were done freely. In giving up our freedom, we give up our morality and our humanity.

Rousseau also objects to the suggestion that prisoners of war could become slaves through an even exchange, where the conqueror spares the life of the vanquished in exchange for that person's freedom. Wars have nothing to do with individuals. Wars are conducted between states for the sake of property. When an enemy surrenders, he ceases to be an enemy and becomes simply a man.

Rousseau wasn't advocating totalitarianism.

When people aren't abiding by the general will and they are "forced to be free", this wasn't advocating totalitarianism. The general will is the law that is accepted as just, and those who don't follow the general will are breaking the law. Rousseau is advocating for forcing people to follow the law because it is in everyone's best interest to do so.

- 1 Jean-Jacques Rousseau: Restless Genius by Leo Damrosch
- 2 Reading Rousseau in the Nuclear Age by Grace Roosevelt
- 3 Rousseau: An Introduction to His Psychological, Social, and Political Theory by N J H Dent
- 4 Rousseau, the Age of Enlightenment, and Their Legacies by Robert Wokler
- 5 Rousseau's Critique of Inequality by Frederick Neuhouser

We need to have a plan of action for Nevada that will solve the Utility GRID problems in 2025 and for the future electric loads.

The Old way of connecting residential and business customers to an Electric Grid, the new way of connecting, and how users will pay for Energy.

Section One- State Government trying to regulate Utilities owned by Corporations using old Hydro and Fossil Fuel Generating Facility Design vs. new Technology Fusion/ Molten Salt, large and Small Facilities designed for Local Load switching.

State Governments try to support new Technology; however, the reality has been to hold back Solar, Wind, and Fusion Technology, to continue using Coal and Gas to increase the Grid Capacity. Climate no longer makes this a good long-term choice for Nevada.

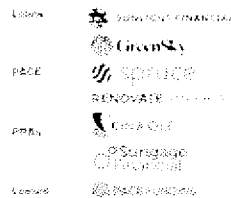
Governor Sandoval eliminated Residential Solar in the second-best location for Solar in North America, the state of Nevada, and all the Solar companies left the state in 2015.

The Small Business and Residential customers who wanted a known (ROI) Return on Investment, had only Tesla in 2019 to design and install properly engineered Solar Systems that met the California Solar Standards, one of the best in the USA, with monitored control of the Solar Batteries, and with on-site service in the state of Nevada.

Here is the Residential proof:

Our Residential Solar System Design

2015 start of a solar system design with SUNRUN



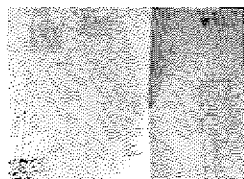
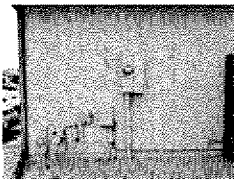
The NVENERGY monthly electric invoices for a year were provided to SUNRUN to allow them to calculate the size of the Photo Voltaic Panel Array size. NVENERGY Restricted the Net-Metering array size to not more than 100% of the usage data for our home. This was an attempt by the utility to discourage Solar in Nevada. I attended a Solar meeting at the Nevada PUC to express our opinion about why Solar is important for the health of our community. NVENERGY Lawyers were also at this meeting to apply for service rate increases and to discourage the use of Solar in Nevada.

Introduction to a Solar System Design

1-0

SUNRUN SOLAR SYSTEM

- SUNRUN Designed a Net Metering SOLAR SYSTEM for our home
- Battery Storage was not Included
- NV Energy Loads from January to December 2015 were used by SUNRUN to calculate the Photo Voltaic (PV) Size and restricted by NV Energy to 100% of load.
- SUNRUN was Paid the System deposit in 2015
- Washoe County and the HOA Approved the SUNRUN Drawings in 2015



Introduction to a Solar System Design

1

Gov. Sandoval did not approve Solar in 2015 for Nevada

In 2015 SUNRUN returned our deposit and left Nevada
This is when we started to design our own Solar System and try and find a local installer

The two PV to AC Inverter software systems we downloaded and learned to use were
Sunny Boy from Germany and SolarEdge from California.

We have worked with Wholesale Solar in California, SunWorks in Sacramento,
GoSolar, Utah, Peterson-Dean, Reno, and SimpliSolar, Truckee, but were unsuccessful
in getting an Installation that met the California Solar Standards with trained
installers.

Tesla Solar Systems came to Northern Nevada and designed and installed the Solar
PV system in 2018 with trained installers. The Powerwall II was added in 2019. Thank
you, Governor Sisolak.

The Children's hospital needed the Powerwall's in Puerto Rico in 2018 and we had
electric service, they did not. We chose to wait ten months for our Powerwall II.



TESLA



Introduction to a Solar System Design

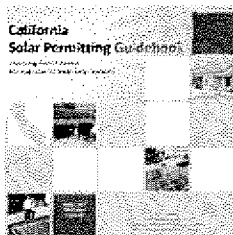
2

Design of Solar System Reference

CALIFORNIA ENERGY COMMISSION
A GUIDE TO PHOTOVOLTAIC (PV) SYSTEM DESIGN AND INSTALLATION
Prepared for:

California Energy Commission Energy Technology Development Division 1516 Ninth Street Sacramento, California
95814

http://www.cenr.ca.gov/docs/Solar_Permitting_Guidebook_Winter_2017_Update.pdf



Governor's Office of Planning and Research
Office of Sustainable Energy Policy



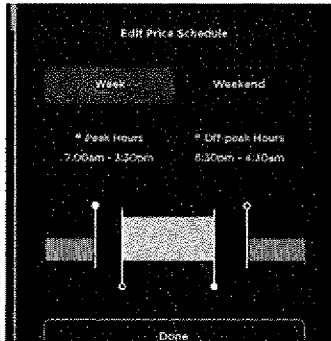
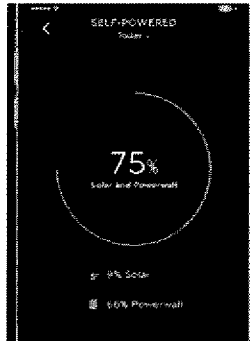
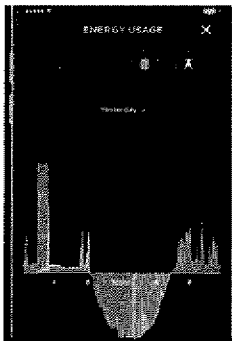
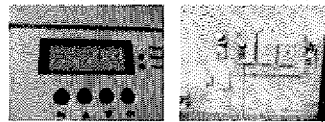
Introduction to a Solar System Design

3



TESLA Solar System Transfer Switch

- Powerwall II on-line with Tesla central and charging from PV.
- Photos of the Tesla app download after commissioning. Same as Australia & UK.



Three Meters for net-metering in the photo above.

ACTUAL COSTS OVER NINE YEARS

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Cost	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
Overcharge	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00

January to July 2025 overcharge

Please send you comments to anchois6330@gmail.com

Introduction to a Solar System Design

1:24

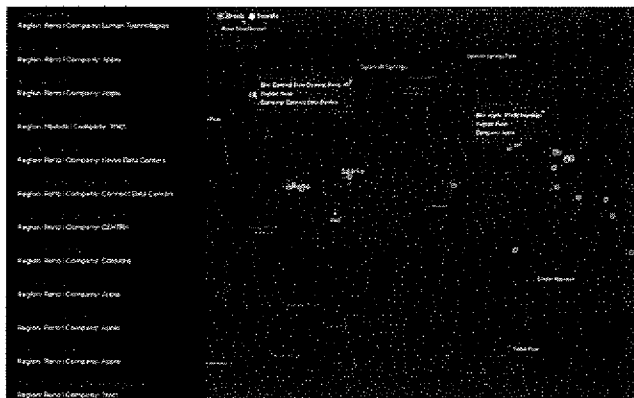
Cost of NV Energy Electric from 2017 to 2025 a

Account: Why was Net-Metering removed from NV Energy statements in 2025?

Data Center expansion

The Cost to Supply Energy Generated in Northern Nevada for the DATA CENTERS of Microsoft, Amazon, Meta, Switch, Apple, Google, Vantage, Oppidan, etc.

Twenty-five data centers are currently in operation or planned for Northern Nevada.



Richard Bednarski with The Nevada Independent
Friday, April 25, 2025

Last month, the Reno City Council approved the Oppidan Data Center to become the city's second data center, despite the city planning commission's original denial of the project. The back-and-forth decision coincides with the ongoing city council debate about how to regulate data centers, in light of their significant energy and water demands to power artificial intelligence (AI) models such as ChatGPT.

"Every time a user inputs a prompt, ChatGPT's massive language model processes it using an estimated 2.9 watt-hours (Wh) of energy," reported RW Digital, a digital marketing firm. "That's nearly ten times what it takes for a single Google search."

A Google search uses the equivalent energy needed to power a standard lightbulb for almost 20 seconds, but that's a modest amount compared to a ChatGPT inquiry. ChatGPT sees more than 200 million queries daily, consuming about 621.4 megawatt-hours (MWh) of energy. This energy demand is sufficient to power an average American home for more than 57 years.

Therefore, using artificial intelligence models now beckons the question: How am I planning to compensate for the climate toll of AI?

"Becoming overly reliant on AI and other power-hungry processing tools has a significant impact on our ability to move away from greenhouse gases," said Sierra Club Toiyabe Chapter Director Oliva Tanager. "AI seems cool, but really it's siphoning money in more ways than one from working-class people to the billionaire class."

Electricity required to power data centers.

The Sierra Club has found that utility rates have gone up for residents in states that have experienced a data center rush. Because of this, one California planning commissioner has dubbed data centers "tapeworms" that take from the community and fail to give back in a meaningful way.

"Utility customers should not have to pay the price when a big data center sets up shop in their area," said Abe Scarr, the state director with Illinois PIRG Education Fund. "Maximizing energy efficiency, generating clean power on-site, and ensuring that data centers pay the full cost of necessary grid upgrades can help reduce the impact on consumers."

That's in part why Tanager and the Sierra Club are working to pause local data center development so regulations can be defined, citing negative economic and energy impacts elsewhere.

"We are asking for a pause in the development of data centers," said Tanager. "So that decision-makers at every level and community members across Northern Nevada can get a handle on how these facilities impact residents, climate goals, and natural resources."

While many electric grids rely on fossil fuels, data centers also place additional strain on energy systems that are actively transitioning toward renewable sources. This means data centers are inadvertently delaying the drawdown of greenhouse gas emissions.

According to the Electric Power Research Institute (EPRI), Nevada, along with 14 other states, accounts for 80 percent of the nation's electrical demand for data centers. Specifically, the EPRI found that data centers accounted for 8.69 percent of all the electricity consumed in Nevada in 2023, and the organization projects that figure could grow to nearly 20 percent by 2030.

The same EPRI report projects that the electricity demand of data centers could potentially reach 166 percent of current levels within the next five years.

"The United States accounts for by far the largest share of this projected increase," a separate report from the International Energy Agency stated. "By the end of the decade, the country is set to consume more electricity for data centres than for the production of aluminum, steel, cement, chemicals, and all other energy-intensive goods combined."

So how will this growing demand affect utility rates for Nevadans? The Sierra Nevada Ally reached out to NV Energy and received the following email response:

"We coordinate closely with all new businesses looking to come to Nevada, including data centers. Our teams work diligently on our long-term planning to make investments in our infrastructure to serve new customers and the continued growth in the state without putting existing customers at risk. NV Energy currently serves approximately 25 data centers in the state."

NV Energy did not respond to repeated follow-up inquiries.

Water demands to cool data centers.

Much like people in the hot summer sun, data centers also require significant water demands for cooling. One large data center is capable of consuming upwards of 5 million gallons of water a day – equivalent to seven and a half Olympic-sized swimming pools. According to a presentation at the February Reno City Council Meeting, the local data centers will use less than 10 acre/feet of water each year, or about five Olympic-sized swimming pools.

In the most arid state in the country, wise water use is paramount. This hydro-demand could add resource stress to the local community.

"One-fifth of data center servers' direct water footprint comes from moderately to highly stressed watersheds, while nearly half of servers are fully or partially powered by power plants located within water-stressed regions," wrote researchers Abu Bakar Siddik, Arman Shehabi, and Landon Marston in a key study about data center resource consumption.

Locally, the Truckee Meadows Water Authority (TMWA) is taking steps to protect the region's water resources.

"The requirement for [data center] water service is the same as with any new development," said Danny Rotter, TMWA's assistant general manager. "Developers must obtain water rights on the open market and dedicate them to TMWA."

For every acre-foot required for service, TMWA requires developers to add 11 percent of water rights for drought reserves. This water is stored in upstream reservoirs, such as Boca or Stampede. This safety net is matched by TMWA's population prediction modeling conducted every five years, which helps predict future water demand.

"Using the most advanced population forecasting and water supply modeling available, TMWA's Water Resource Plan indicates our region will have sufficient resources for decades to come," said Rotter.

Though new projects such as data centers may require additional infrastructure, "developers are assessed hook-up fees and required to pay for any new infrastructure needed for their projects," said Rotter. "From pipes to pumps to increased treatment capacity."

This requirement places the cost of new development in the hands of the developer, not existing customers, which is a TMWA policy.

Economic implications of data centers

Data centers in Nevada are eligible for a 75 percent property tax abatement, along with other tax incentives. In theory, tax abatements spur economic growth by enabling businesses to pay discounted taxes to the state for a designated period of time. While tax abatements are often leveraged to bring new employment to the region, they can come at a cost to local resources. These tax breaks often divert funds away from things like funding for affordable housing, health care services, park maintenance, and other essential public services.

Furthermore, data centers typically do not generate substantial long-term local employment. Once operational, a data center generally employs between five and 30 highly skilled individuals, with most of the new jobs coming from construction.

Despite these economic implications, solutions exist for effectively regulating and building data centers.

Tanager points to the city of Missoula, Montana, as an example of future-proof thinking around data center regulations. For one, the city requires data centers to offset electricity use with renewable energy production. She recommended that Reno capitalize on these lessons to avoid harm to the local community.

"[They have] restricted data centers to industrial areas, requiring verification that all electronic waste be handled by a licensed recycling firm," said Tanager.

Tanager and the Sierra Club believe the public should care about new data centers because of how hugely harmful they can be to local communities.

"What this really boils down to is a class issue: Working-class people do not want their neighborhoods filled with noisy, hot data centers that don't employ any of their neighbors," said Tanager.

"Key players in Nevada are dragging their feet because they have convinced themselves that turning Northern Nevada into the next Silicon Valley is a good idea."

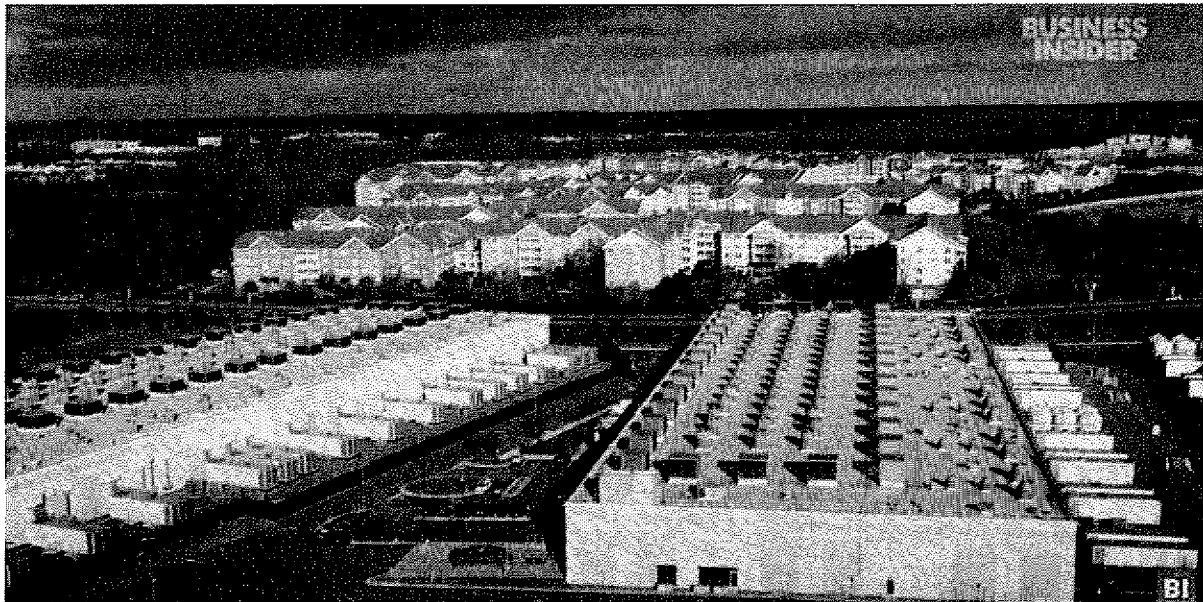
Exposing The Dark Side of America's AI Data Center Explosion

The explosion of AI across every industry has seen hundreds of water- and power-hungry server farms sprout up across the US. Already, one-third of the world's internet traffic flows through data centers in just one US state: Virginia. However, until now, there has been no official record of the number of data centers in America, who owns them, or how much electricity they consume. In an exclusive deep dive into the industry, Business Insider reporters cracked the code and, for the first time, revealed the true cost of the data warehouses feeding our growing appetite for cloud computing and AI. We travelled to Virginia to meet people living in the shadow of 80-foot-high boxes that emit a constant drone, and to the drought-ridden state of Arizona, where some data centers are using as much as a million gallons of water a day to help cool their computer servers. Business Insider also discovered that the power needs of data centers have forced some states to withdraw from their carbon emissions targets. Power companies are even looking to extend the life of coal and gas plants to help meet the unprecedented demand. You can access our long read on data centers on the Business Insider website:

<https://www.businessinsider.com/ai-da...>

Here is the data on how much energy and water are used, finally, factual data:

YouTube Video. <https://www.youtube.com/watch?v=t-8TDOFqkQA>



CHAPTERS: 00:00 - Intro 01:34 - Welcome to Data Center Alley 02:41 - Living Next Door to a Data Center 05:16 - How We Built Our Data Center Map 07:59 - A Drive Through 'Data Center Alley' 09:21 - Inside a Data Center in Wyoming 12:23 - How Does a Data Center Work? 13:52 - Living With the Drone - Meet Carlos 17:34 - Thirsty Data Centers in Drought Country 23:25 - Data Centers Vs Environmental Targets 26:38 - Tax Breaks and Incentives 28:34 - Just the Beginning 29:14 - Donna's Choice 29:48 - Company Responses 30:25 - Credits

There is no public database of data centers and the amount of energy each one requires.

The only way to find the energy needs of each is to verify the number of Caterpillar generators each data center has purchased.

Cat® C175-16 Diesel Generator Sets



Image shown may not reflect actual configuration

Bore - mm (in)	175 (6.89)
Stroke - mm (in)	220 (8.66)
Displacement - L (cu ft)	04.7 (164.63)
Compression Ratio	16.7 : 1
Aspiration	TA
Fuel System	Common Rail
Governor Type	ADCM™ A4

Standby 60 Hz kW (kVA)	Maximum Output 60 Hz kW (kVA)	Prime 60 Hz kW (kVA)	Continuous 60 Hz kW (kVA)	Emissions Performance
3100 (3675)	3100 (3675)	2625 (3334)	2100 (2250)	U.S. EPA Stationary Emergency Use Only (Tier 2)

Standard Features

Air Quality permits are required for each generator. Permits for air permits were downloaded from all 50 states. The data lists the generator capacity to extrapolate the power. Also, who owns these generators?

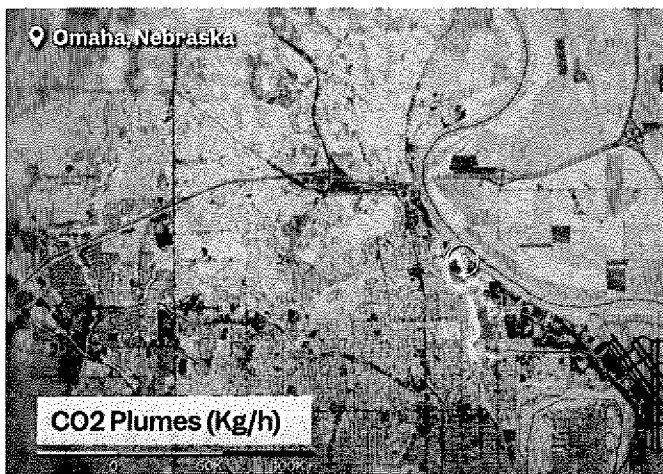
Columbus, Ohio, has 164 permitted generators by Magnum LLC, owned by Google. In 2024, there were 1240 data centers that purchased generators. 177 data centers belong to Amazon. In 2023, data centers in Ohio consumed 25% of the state's electric grid.

The largest data centers consume 2 terawatt hours of electricity a year, enough to power 200,00 homes. Chilled water is used in cooling towers to remove the heat. The noise from the data centers is 24/7, all year round.

In Maricopa County, Arizona, the Microsoft data centers consume 800,000 kW of energy, with 1.3 billion gallons of drinking water per year. This is equal to the amount the entire city of Santa Clara, California, consumes. Data Center Water wells are taking from the Aquifer.

This amount of drinking water use is not sustainable in the Southwestern States. 43% & of Data Centers are located in dry climates.

Nebraska Public Power was committed to zero emissions by 2050, but is now using coal power plants and gas peakers for Data Center demands in Springfield, equal to 400,00 homes.



June 2023 Plume of CO2, 300,000 Kg per hour.

Microsoft agreed to buy power from Three-Mile Island Nuclear in Pennsylvania in 2027 when it reopens.

Massive upgrades to the Nevada Electric Grid are required for the Data Center, EV, and Electric Train demands in 2025, 2026, and 2027.

A State Commission to Plan for the Nevada Grid is no longer optional to expand cost-effectively without adding unsustainable price rises to Residents and Small businesses in Nevada.

Depending on privately owned utility companies to expand the electric grid and the use of drinking water is wishful thinking.

To explore data centers in Story County, Nevada, in 2025, consider the following points for the State Commission Plan for the Nevada Electric Grid:

- Anticipate growth in demand for cloud services and data storage.
- Evaluate the impact of renewable energy initiatives on data center operations.
- Investigate local infrastructure developments to support data center expansion.
- Assess potential partnerships with tech companies for investment opportunities.
- Monitor regulatory changes affecting data center construction and operation.
- Explore workforce development programs to ensure skilled labor availability.

Conclusion:

For Nevada Residential Energy use.

Tesla was the best we could find after Governor Sandoval stopped the Solar business in Nevada. The electrical inspection by Washoe County was a concern when a firefighter from Truckee Meadows Fire inspected the Red Stickers on our Tesla Solar System.

My goal is to have the investment we made in Solar return our money before the Tesla Solar company vanishes. I do expect accountability for 10 through 13.

10- NV Energy has some of the highest-paid management in its industry.

11- NV Energy was caught overcharging its customers and not reimbursing them.

12- Doug Cannon, the former President and CEO of NV Energy, resigned from his position in May 2025. This departure came during a regulatory investigation by the Public Utilities Commission of our state for allegations that NV Energy overcharged thousands of its customers. Specifically, this investigation revealed: NV Energy overcharged tens of thousands of residential customers by at least \$17 million between 2017 and 2024, possibly dating back to 2001. This was due to misclassifying multi-family residences as single-family homes. NV Energy allegedly limited refunds to affected customers using an inappropriate rule, issuing only less than \$2 million in refunds. The PUCN is currently investigating whether NV Energy violated regulations and if full refunds are

necessary for affected customers. Cannon's resignation was seen by some advocacy groups as a first step towards accountability and systemic reform within NV Energy. Multi-family residences usually have a meter for each tenant?

13- Our family was overcharged from January to July 2025 when NV Energy removed the Third meter from our monthly statements. We expect a refund for this six-month overcharge, and we have the NV Energy PDF statements that show the 2025 discrepancy.

My family does not understand why NV Energy has removed the Net-Metering that they signed legal documents to provide from January to July 2025. This act has reduced our ROI.

In July 2020, the Excess Energy Credit carryover was \$224.44 Cr.

In July 2025, the Excess Energy Credit carryover was \$0 Cr.

The NV Energy statements show we used 127 kWh more in July 2020 and paid \$16.14.

The NV Energy statements show we used 127 kWh less in July 2025 and paid \$19.48.

The Investment in our residential Solar System was a financial decision to have a return on investment to complete before the Warranty of the Tesla Hardware expires and NV Energy lobbies to cancel Net Metering in the State of Nevada.

At the end of 2025, we expect the return on investment to be \$11,500.00 of the \$23,000.00 we have spent on the Tesla Solar System. However, the rate increases from NV Energy have increased from \$16.10 in 2019 to \$19.48 in 2025.

To calculate the percentage of increase from \$16.10 to \$19.48, please follow the steps:

Calculate the increase:

Subtract the original value from the new value: $\$19.48 - \$16.10 = \$3.38$

Divide the increase by the original value: $\$3.38 \div \$16.10 \approx 0.209937888$

Multiply by 100 to express it as a percentage: $0.209937888 \times 100 \approx 20.99\%$

Therefore, the percentage increase from \$16.10 to \$19.48 is approximately 20.99%.

The NV Energy rate in 2025 is more than the Consolidated Edison rate for over ten million customers.

Paying 21% more for NV Energy electric from 2025 to the next rate increase extends our return on investment from 14 years to over 20 years. This is past the Tesla hardware warranty.

Warren Buffett and Charlie Munger's reputation is a slow and steady profit.

Email From Pamela Stayden, NV Energy 2018

Hi Alan,

Please reply to your request to switch contractors from Sunrun to Tesla. Then we will have Tesla take over the application. Once they take over the application, they will update the equipment, but they cannot exceed the 4.379 kW CEC-AC system size, or you will lose your Grandfathering rate.

Once Tesla takes over the application and puts in their equipment, they will need to regenerate the Net Metering Agreement and the Incentive Claim Form for signatures.

Thank you, Pamela Stayden, *Project Administrator, SolarGenerations Program* 866-786-3823 NV Energy

Our Solar Contract FACTS:

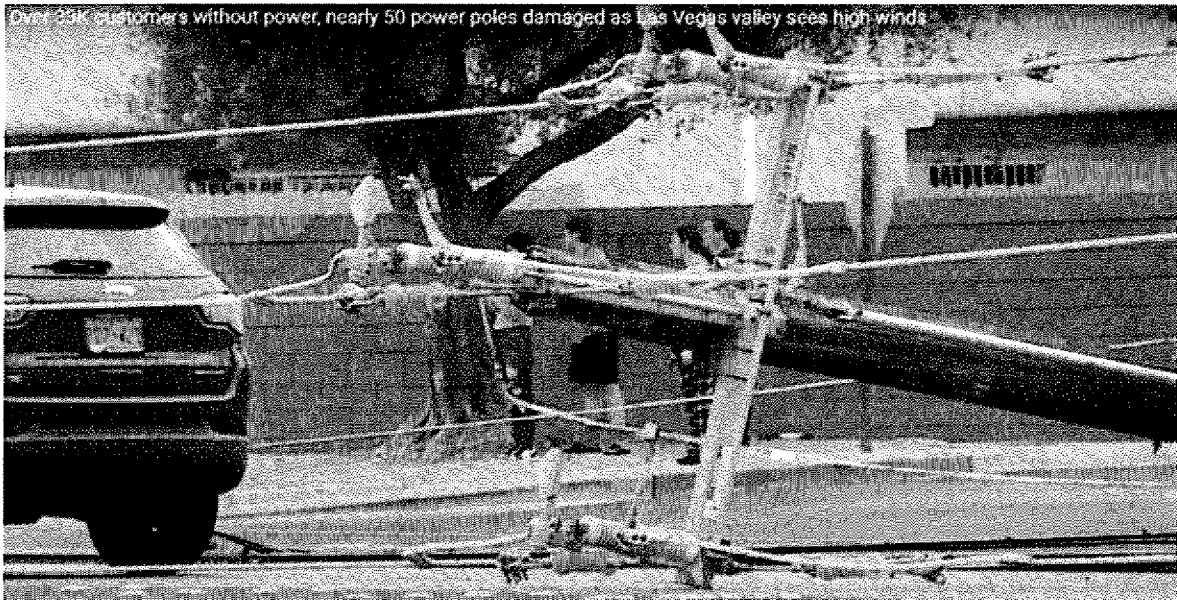
Grandfathered in 2018 for [REDACTED] for 1:1 NMR-G Net metering rate from NV Energy, A3 405 rate is 95%. CEC AC size and DC size are 4.379 AC and 5.035 DC from NV Energy.

- 1- 5.035 DC Grandfathered 1:1.**
- 2- Tesla Recalculate the 2018 Load New Application for 95%**
- 3- Add EV second battery for EV- Tesla New Application for 95%**
- 4- The 1:1 NMR-G net metering rate from NV Energy, also known as the NMR-G rate, provides a one-for-one credit for excess energy generated by a customer's solar system. This means that for every kilowatt-hour (kWh) of electricity your system exports to the grid, you receive a credit of one kWh on your future bills. The NMR-G rate is a "banking" system, where any unused credits are carried over to future bills.**
- 5- NMR-G Net Metering Rate: 1:1 Credit: You receive a 1:1 credit for any excess energy you generate and export to the grid.**
- 6- Banking: Unused credits are carried over to future bills.**
- 7- No Expiration: Banked credits do not expire.**
- 8- NMR-405 Net Metering Rate (Assembly Bill 405):**
- 9- Tiers: The NMR-405 rate has different tiers, each with a specific credit rate (e.g., Tier 1: 95% of the retail rate, Tier 2: 91% of the retail rate, etc.).**
- 10- Credit Rate: The credit rate is determined by the tier you were assigned when your rooftop solar application was received by NV Energy.**

- 11- Credit Period: The credit period is 20 years. (Residential Solar ROI has changed from 12 to 16 years due to NV Energy rate increases of 12% (20%), which can change with Data Center Load increases.)
- 12- Opt-in: Current NMR-A customers can voluntarily opt in to the NMR-405 rate.
- 13- No Backtracking: Once you opt-in to NMR-405, you cannot switch back to your previous rate.
- 14- Key Differences between NMR-G and NMR-405:
- 15- Credit Rate: NMR-G provides a 1:1 credit, while NMR-405 offers a percentage of the retail rate based on your tier.
- 16- Tiered System: NMR-405 has a tiered system, while NMR-G does not.

Jenny and Alan will send Pamela an Email on Monday, April 23, 2018, to have NV Energy change Sunrun to Tesla.

Outages:



We have seen the NV ENERGY outages at my home increase from under one hour to over 10 hours, which left our house in the dark.

Two of the four family members who live in our house are Seniors with heart ailments and have been taken to Renown several times in the past few years. Several times, we had oxygen pumps (350W) and used electric heaters in the bedrooms (700W). We need Camping Solar with a backup battery just for a Medical emergency, not more PV for the grid. NV Energy wants to raise the electric rate and reduce the Net-Metering rate for adding PV to existing approved residential Solar Systems to make more profit.

Over 33K Las Vegas customers are without power for weeks.

On July 3, 2025, in Las Vegas, Nevada, 50 wooden power poles snapped or blew over in the wind, leaving 33,000 NV Energy customers without power in the blistering heat.

Flights leaving Las Vegas were delayed, and a dust storm warning was issued after wind gusts reaching 70 mph were reported in the Las Vegas valley on Tuesday. At 3:30 p.m., the National Weather Service in Las Vegas reported that gusts of 65 to 70 mph were in the far southern parts of the valley. A severe thunderstorm warning for the Las Vegas valley was extended to 3:45 p.m. Tuesday.

Wooden utility poles have varying load limits depending on their class, with higher-class poles supporting greater loads.

For example, Class 1 poles are designed for heavy-duty transmission lines and can support 4,500 lbs., while Class 6 poles are for minimal loads like telecommunications and support up to 1,500 lbs. Common distribution poles (Classes 3-5) handle loads from 1,900 to 3,000 lbs.

Corporation utilities, which are run for profit, are not the best alternative for rural states like Nevada, especially when the Water in Lake Mead is almost at the level to stop Hydro, and Small Fusion Reactors are coming online. The California Law in 2025 restricts Utilities from discriminating against Solar and Wind companies.

PBS: How AI infrastructure is driving a sharp rise in electricity bills

<https://www.pbs.org/newshour/show/how-ai-infrastructure-is-driving-a-sharp-rise-in-electricity-bills>

Geoff Bennett:

So much of this data center build-out is relatively new. Should we be bracing for even higher prices in the years ahead, or are we already seeing the peak?

- **Ari Peskoe:**

I think it's certainly possible that the costs of this data center expansion are going to increase for everyone.

And that's because these data centers have been part of the backbone of our Internet for some time now, but the size of these facilities has just so vastly expanded since the introduction of ChatGPT just a few years

ago, really kicked off this wave of, again, these city-sized data centers that we have never seen before. And many of them are still in development.

So the costs of all the infrastructure and energy associated with them really haven't hit our bills just yet.

- **Geoff Bennett:**

And, of course, the Trump administration is pushing coal, natural gas, and nuclear power to meet the AI-driven demand, while kind of moving away from renewable energy, like wind and solar. Do you see that approach as addressing the core challenge posed by the rising energy needs?

- **Ari Peskoe:**

No, I mean, it doesn't make any sense to take supply options off the table. And that's really what this administration is doing, particularly with wind energy.

We really need every option we can to boost the amount of electricity if we're going to power these new computing facilities. And, as I said, demand is rising, and that's causing prices to go up in many markets around the country. When demand goes up, you want to increase supply as well. And under basic economics, that's going to even out some of the prices.

But it doesn't make any sense what they're doing.

Gov Lombardo Announces Executive Action To Advance Energy Independence

Energy policies must pursue a balanced approach to energy use and development, and support 'Nevada's objectives of reliability, affordability, and sustainability'

By Megan Barth, March 27, 2023, 2:52 pm

Hang on to your gas stoves, Nevadans.

Republican Governor Joe Lombardo announced an executive order (see below) outlining his “balanced” state energy policy objectives for the next decade—a multi-faceted approach to include solar, wind, geothermal, hydropower, natural gas, hydrogen, and energy storage. The order also highlights energy policies that will ensure Nevadans and businesses will have diverse energy options, including gas and electricity.

Due to the bipartisan passage of Senate Bill 358 in 2019, which established a goal to achieve a 50 percent renewable energy portfolio standard by 2030, Lombardo contends state energy policies “must pursue a balanced approach to energy use and development” and support “Nevada’s objectives of reliability, affordability, and sustainability.”

Section 2 of the order provides that Nevada will “develop sufficient in-state electric generation resources to ensure the needs of all Nevadans are met and ensure that Nevada has sufficient electric generation resources to mitigate the risk of energy markets not having sufficient electric energy supplies during peak usage.”

The following statement was released by his office this afternoon:

Today, Governor Joe Lombardo announced Executive Order 2023-007, which outlines his state energy policy objectives for the next decade. The Executive Order highlights Governor Lombardo’s multifaceted approach to state energy policy and fulfills his promise made in his State of the State speech to address energy objectives through an executive order.

Per Executive Order 2023-007, the state's energy policy will be focused on developing and maintaining a robust, diverse energy supply portfolio and a balanced approach to electric and natural gas energy supply and transportation fuels. Additionally, Nevada's energy portfolio will work to advance sustainability and reliability by including solar, wind, geothermal, hydropower, natural gas, hydrogen, energy storage, and other resources needed to meet the vast energy demands in the state.

The executive order also requires that state energy policies work to ensure all Nevada consumers and businesses continue to have diverse energy options available to them, including electric and natural gas service and energy efficiency and renewable energy resources.

"Governor Lombardo's energy policy objectives provide a critical framework for the future of energy in Nevada," said Dwayne McClinton, the Director of the Governor's Office of Energy. "I look forward to partnering with Governor Lombardo to achieve his energy objectives through thoughtful and effective policy implementation."

EXECUTIVE ORDER 2023-07

Order Establishing the State of Nevada Energy Policies Objectives

WHEREAS, safe, reliable, affordable, and sustainable energy supplies are essential for the public welfare of the State of Nevada and are critical in supporting economic development and job growth;

WHEREAS, the state has tremendous capacity to develop and employ electric projects to be a leader in clean energy development through abundant renewable energy sources, including solar, geothermal, and wind resources;

WHEREAS, affordable, safe, and reliable energy and delivery systems are extremely important for Nevada homes and businesses as they provide essential services to Nevadans and for attracting new businesses and industries to Nevada;

WHEREAS, continued investment in Nevada-based energy projects is necessary to have a balanced energy portfolio that includes renewable energy resources, low-carbon resources, including natural gas, and the utilization of regional transmission and infrastructure to acquire energy resources is necessary to ensure safe, reliable, and affordable delivery of energy statewide;

WHEREAS, with overwhelming bipartisan support in the legislature, the passage of Senate Bill 358 in the 2019 Nevada Legislative Session established a goal to achieve a 50 percent renewable energy portfolio (RPS) standard by 2030;

WHEREAS, to achieve the objectives of Senate Bill 358 (2019) while still maintaining adequate energy resources, Nevada must pursue a balanced approach to energy use and development by utilizing all available energy and storage resources, including natural gas, solar, geothermal, hydroelectric, wind, hydrogen, energy efficiency, and energy storage projects;

WHEREAS, Nevada has an existing skilled workforce that will be critical in maintaining, developing, building, and operating energy projects throughout the state;

WHEREAS, Nevada must continue to advance policies to address climate change and reduce economy-wide greenhouse gas (GHG) emissions through encouraging investment in new technologies and innovation;

WHEREAS, sustainability policies must be advanced while ensuring all Nevadans have affordable and reliable energy;

WHEREAS, the energy industry in Nevada will continue to set the standard for job creation in skilled trades, economic diversification, innovation, and development of safe, reliable, and affordable energy resources to the benefit of the entire state; and

WHEREAS, efforts to ensure energy stability and reliability through the production or acquisition of resources sufficient to meet the needs of all in-state users and to develop a balanced energy portfolio should be designed, developed, and deployed in such a manner as to minimize energy cost borne by the state's residential and commercial users.

NOW, THEREFORE, by the authority vested in me as Governor by the Constitution and laws of the State of Nevada and the United States, it is hereby ordered as follows:

Section 1

The state's energy policy will be focused on developing and maintaining a robust, diverse energy supply portfolio and a balanced approach to electric and natural gas energy supply and transportation fuels that emphasizes affordability and reliability for consumers. This energy portfolio shall also advance sustainability and reliability by including solar, wind, geothermal, hydropower, natural gas (for both electric generation and direct use in homes and businesses), hydrogen, energy storage, and other resources needed to meet the vast energy demands in the state.

Section 2

Nevada will develop sufficient in-state electric generation resources to ensure the needs of all Nevadans are met and ensure that Nevada has sufficient electric generation resources to mitigate the risk of energy markets not having sufficient electric energy supplies during peak usage periods. The state will also develop transmission and energy infrastructure to ensure that Nevada is a regional leader in exporting its solar, wind, and geothermal resources and has sufficient transmission to import dedicated resources that support Nevada's objectives of reliability, affordability, and sustainability. Nevada's advancement of energy independence will spur economic development, lead to job creation, drive low-cost energy for Nevadans, and reduce carbon emissions for future generations of Nevadans.

Section 3

The energy policies pursued by this administration will focus on job creation, economic development, and investment in our state by directing our energy providers to deliver affordable, reliable, and sustainable energy to Nevada residents and businesses. These policies shall:

- A. Capitalize on the existing highly skilled workforce in the state.
- B. Promote job creation in the skilled trades and attract diverse talent by leveraging workforce development and career training programs through public/private partnerships with energy providers, colleges, universities, trade schools, and labor groups within Nevada; and
- C. Focus on energy policies that encourage economic development and diversification, increasing investment in Nevada.

Section 4

The state's energy policies shall ensure all consumers and businesses continue to have diverse energy options available to them in their homes and businesses, including electric and natural gas service, energy efficiency, and renewable energy resources.

Section 5

The state shall implement policies that reduce regulations and streamline the permitting process to provide for shorter approval timelines for energy projects while providing for appropriate environmental and cultural resource reviews. This will be a key factor in Nevada's economic development efforts to attract investment to our state. These policies include:

- A. Concurrent permit review at the state agency level. When applicable, state agencies and their subdivisions shall review permitting applications concurrently rather than sequentially.

- B. The Governor and appropriate state agencies shall advocate for concurrent and/or expedited review at the Federal level with applicable Federal agencies.

Section 6

Nevada's energy policies shall promote energy innovation and leverage our premier research universities, resources, and industries to do so. It will also focus on the development of battery, hydrogen, and other energy storage technologies coupled with renewable energy projects.

Section 7

The strategic goals for developing Nevada's energy future shall be:

- A. The maintenance of affordable rates and increasing the reliability and resiliency of energy for Nevadans by diversifying our energy portfolio, utilizing all available energy production options.
- B. Pursuing new energy transmission, infrastructure, and energy storage projects to access additional resources from regions that complement Nevada's energy usage to further diversify our energy portfolio;
- C. Having our utilities secure a sufficient energy supply through dedicated in-state energy resources, including both utility-owned and third-party-owned solar, that ensure reliability for Nevadans while uncertainty and volatility exist in broader western energy markets, while also ensuring Nevadans continue to have affordable, diverse energy options available to them in their homes and businesses; and
- D. Continue to pursue options for Nevada to participate in an organized western energy market when such a market furthers Nevada's objectives of reliability, affordability, and sustainability.

Section 8

State agencies within the executive branch of the Nevada government shall work together and collaborate with businesses and other organizations to implement and accomplish these policy objectives.

Section 9

The Nevada Climate Strategy shall be reviewed and revised, as applicable, through a broad-based stakeholder effort to reflect these policy directives.

Section 10

The administration and state agencies shall collaborate, as necessary, with local governments within the state, tribal nations, federal agencies and bureaus, and other appropriate industries and businesses to advance the policies established by this Executive Order.

Section 11

This order is effective upon signature and shall remain in effect until December 31, 2033, unless it is terminated earlier or extended beyond that date by subsequent Executive Order.

Executive Order Governor Brian Sandoval issued an executive order in January 2016 reconvening the New Energy Industry Task Force and charging it with providing recommendations on the best energy policies for Nevada's future. The Task Force will specifically address policies that encourage the development of clean energy sources and integrate renewable energy technologies into Nevada's energy sector, foster the creation of a modern, resilient, and cost-effective energy grid, and support distributed generation and storage with a specific focus on rooftop solar and net metering. The order states that clean and renewable energy is important to the economy and environment of the State of Nevada. The Governor's Office of Energy Director serves as the chair of the Task Force, which also includes members of industry, utility, environmental interests, the Nevada Legislature, and representation from other valuable stakeholders. (See Appendix E for the Executive Order) i.

For Nevada Business Energy use.

Directions to New Energy Industry Task Force

1. Encourage the development of clean energy sources and integrate renewable energy technologies into the energy sector
 2. Foster the creation of a modern, resilient, and cost-effective energy grid
 3. Support distributed generation and storage with specific focus on rooftop solar and net metering
- B. Governors' Accord for a New Energy Future Nevada Governor Brian Sandoval joined a bipartisan group of 17 governors on February 16, 2016 in signing the Governors' Accord for a New Energy Future - a joint commitment to take action to promote clean energy, clean transportation choices and a modern electrical grid. The Accord provides participating governors – a bipartisan coalition together representing 124 million Americans – with a platform through which their states will collaborate, learn from one another, and leverage partnerships in energy planning and policymaking. The Accord commits that its states will continue to diversify energy generation and expand clean energy sources, modernize energy infrastructure, and encourage clean transportation options. The 17 participating governors represent states that vary considerably in their energy mix and policy portfolios. However, these governors have committed to working together to make transformational policy changes to secure a stronger energy future for their states and the

nation⁷⁹. The 17 participating states are California, Delaware, Iowa, Michigan, Nevada, New York, Pennsylvania, Vermont, Washington, Connecticut, Hawaii, Massachusetts, Minnesota, New Hampshire, Oregon, Rhode Island, and Virginia.

(A copy of The Governors' Accord is located in Appendix C.)

- i. States will: diversify energy generation and expand clean energy sources
- ii. Modernize energy infrastructure
- iii. Encourage clean transportation
- iv. Plan for energy transition
- iv. Work together to make transformational policy changes
- v. Help secure a stronger national energy future

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Docket No. 15-07

SECTION V - SUMMARY OF THE RENEWABLE ENERGY PLAN: NAC 704.9215(2)(e) Nevada Power's existing renewable energy portfolio is adequate to satisfy the RPS through the Action Plan Period. The Renewable Plan embedded in the 2015 IRP describes the Company's plan for complying with Nevada's RPS. The renewable energy plan reviews Nevada Power's current renewable energy portfolio and outlines its strategy for meeting the RPS for the remainder of the planning period. The "renewable energy expansion plan" must accomplish compliance with the forecasted requirements of the RPS, and is itself an input into the economic analysis of supply alternatives performed further in the resource planning process. The renewable energy expansion plan continues Nevada Power's RPS compliance planning and the development of renewable energy resources to meet the renewable goals of the state. Although no new renewable energy projects for RPS requirements are presented for approval in this 2015 IRP, the Company is asking the Commission to consider and approve the actions described below: 1. Nevada Power's request for additional funding to complete predevelopment work on the SEZ site described above, so that the site will be available for a renewable resource in the future. 2. Nevada Power's request for Action Plan approval of a pilot subscription solar program for its customers. To facilitate this program, the Company will use a competitive solicitation to acquire a solar resource of between one and five megawatts. Depending on the level of customer interest, the Company will execute a PPA for an appropriately sized resource, which will provide the source for the subscription program. The costs of the program will be funded by subscribers. RENEWABLE GENERATING FACILITIES Nevada is fortunate to have significant renewable resources throughout the state, including some of the most abundant solar and geothermal potential in the country. The greatest solar resource in the

state overlaps with significant portions of Nevada Power's service territory. While Nevada's wind resource is weaker than that of many other states (based on wind speed and resulting potential production capacity), dispersed wind sites can provide a utility-scale resource. As technology costs have fallen, especially for utility-scale solar PV systems, renewable generation is becoming a more competitive generation alternative, particularly for facilities that can be located in proximity to transmission access.

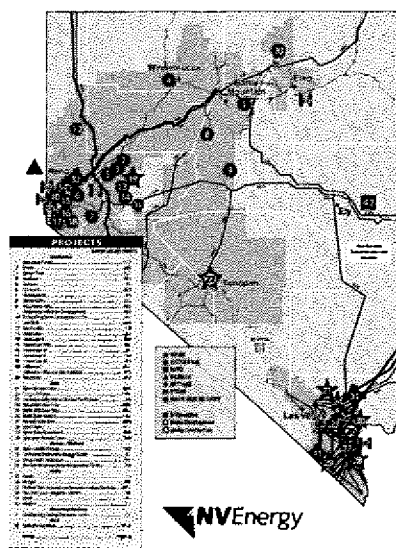
Nevada Power has long-term PPAs in place with many of Nevada's prime renewable resource developers. Projects utilizing these resources are in operation or are now being completed. The following list sets forth all of the facilities that are operating and contributing to the Company's renewable energy portfolio and meeting the RPS requirements as of May 2015:

1. ACE Searchlight Solar, a 17.5 MW solar PV project near Searchlight, Nevada.
2. Goodsprings Recovered Energy Generation Station, a 7.5 MW generating plant that converts waste heat to electrical energy, is located 35 miles south of Las Vegas, Nevada.
3. Desert Peak 2 Geothermal Power, a 25 MW geothermal project located in Churchill County, Nevada.
4. Faulkner 1 Geothermal Power Plant, a 49.5 MW geothermal project located in Humboldt County near Blue Mountain, Nevada.
5. Galena 2 Geothermal Power Plant, a 13 MW geothermal project located in Washoe County, south of Reno near Steamboat, Nevada.
6. Jersey Valley Geothermal Project, a 22.5 MW geothermal project located in a remote area in both Lander and Pershing Counties in Nevada.
7. The McGinness Hills Geothermal Project is a 48 MW geothermal project located in a remote area in both Lander and Pershing Counties of Nevada. As part of the existing twenty-year PPA between NPC and ORNI 39, LLC (owned by Ormat Technologies, Inc.), the facility was expanded to include a second 48 MW geothermal unit.
8. Salt Wells Geothermal Plant is a 23.6 MW geothermal project located in Churchill County, east of Fallon, Nevada.
9. Stillwater 2 Geothermal Plant, a 47.2 MW geothermal project located in Washoe County, Nevada.
10. Tuscarora Geothermal Plant (formerly known as Hot Sulphur Springs 2) is a 32 MW geothermal project.
11. Apex Nevada Solar, a 20 MW solar PV project located in Clark County, north of Las Vegas, Nevada.
12. Las Vegas Valley Water District ("LVVWD" projects), six Las Vegas-area solar PV projects totaling 3 MW owned and operated by PowerLight Corporation.

13. Mountain View Solar, a 20 MW solar PV plant located north of Las Vegas in Clark County, Nevada.
14. Nellis Air Force Base, Solar Star, a 13.2 MW solar PV project that produces energy for Nellis Air Force Base, located north of Las Vegas, Nevada.
15. Nevada Solar One, a 69 MW concentrating solar thermal plant that is located in the Eldorado Valley near Boulder City, Nevada. Approximately 46.9 MW of the capacity and generation is contracted to Nevada Power. The balance of the capacity and generation is contracted to Sierra.
16. Silver State Solar, a 52 MW solar PV project located in Clark County near Primm, Nevada.
17. Spectrum Nevada Solar, a 30 MW solar PV plant located north of Las Vegas in Clark County, Nevada.
18. Stillwater 2 Solar, a 22 MW solar PV project located in Washoe County, Nevada.
19. Spring Valley Wind, a 151.8 MW wind project located in Spring Valley near Ely, Nevada.
20. CC Landfill Facility, a 12 MW landfill gas-to-energy project located in Clark County, Nevada.
21. Lockwood Renewable Energy Facility, a 3.2 MW landfill gas-to-energy project located at the Lockwood Landfill near Reno, Nevada. Renewable energy projects previously approved by the Commission are shown on Figure REN-1 below, which includes facilities contracted to Sierra.

FIGURE REN-1 NVE RENEWABLE ENERGY MAP

NV Energy's Renewable Energy Sources



Pursuant to the Commission's orders in Docket No. 14-05003, Nevada Power issued two of three required RFPs for 100 megawatts of renewable energy each: one in November 2014 and a second in January 2015. PPAs executed with the winning bidders from both RFPs are being submitted to the Commission for approval in a separate filing from this triennial integrated resource plan. That filing seeks approval of: 1.) SunPower, Boulder Solar, 100 megawatts. Nevada Power has executed a twenty-year PPA with SunPower for a 100 megawatt solar project located in Boulder City, Nevada. This project was the top selection from the 2014 RFP. The project is projected to generate 289,288 megawatt hours of renewable energy in its first year. The pricing for this contract is outlined in the ERCR Amendment. is 2.) First Solar, Playa Solar 2, 100 megawatts. Nevada Power has executed a twenty-year PPA with First Solar for a 100 megawatt solar project located on the Solar Energy Zone in Clark County, Nevada. This project was the top selection from the 2015 RFP. The project is projected to generate 307,820 megawatt hours of renewable energy in its first year. The pricing for this contract is outlined in the ERCR Amendment.

SECTION VI - SUMMARY OF ENERGY SUPPLY PLAN: NAC 704.9215(f) Pursuant to NAC 704.9061, an "Energy Supply Plan" means a plan that: 1. Establishes the parameters of an energy supply portfolio for a utility for the three years covered by its Action Plan and which balances the objectives of: a) Minimizing the cost of supply; b) Minimizing retail price volatility; and c) Maximizing the reliability of energy supply over the term of the energy supply plan; and 2. It is composed of a purchased power procurement plan, fuel procurement plan, and risk management strategy. Nevada Power's 2015 ESP will be filed concurrently with this 2015 IRP. The ESP provides the Company's recommended power procurement plan, fuel procurement plan, and risk management strategy based on current conditions and covers the period 2016-2018. This ESP may need to be adjusted over the Action Plan period to adequately respond to changes in the market, changes in the Company's expected loads and resources, and other significant changes in circumstances. Pursuant to NAC 704.9504, Nevada Power may deviate from the approved ESP "to the extent Page 28 of 39 necessary to respond adequately to any significant change in circumstances not contemplated by the Energy Supply Plan." If Nevada Power deviates from its approved ESP, it will inform the Commission's Staff of the deviation as soon as practical. In addition, Nevada Power will include in its next annual deferred energy application a description of and justification for the deviation. If a deviation from the ESP is of a continuing nature, Nevada Power will seek authority from the Commission to deviate prospectively from the ESP in an update of the ESP filed pursuant to NAC 704.9506, or by filing an amendment to the ESP pursuant to NAC 704.9504(3). Pursuant to NAC 704.9508(2) and 704.9494, the Commission may

determine that the elements of an ESP are prudent if the following requirements are met: The ESP balances the objectives of minimizing the cost of supply, minimizing retail price volatility, and maximizing the reliability of supply over the term of the plan. The ESP optimizes the value of the overall supply portfolio of the utility for the benefit of its bundled retail customers.

The ESP does not contain any feature or mechanism that the Commission finds would impair the restoration of the creditworthiness of the utility or would lead to deterioration of the creditworthiness of the utility. a The 2015 ESP balances the objectives of minimizing the cost of supply, minimizing retail price volatility, and maximizing the reliability of supply over the term of the plan. Price volatility risk remains, particularly with respect to fuel supplies. Assuming approval of the proposed ESP, the estimated fuel and purchased power costs during the Action Plan period under the low, base, and high fuel and purchased power price scenarios are summarized in Figure S-14 below:

FIGURE S-14
ESTIMATED COST TO SERVE FOR 2016-2018 (\$000)

Total Fuel and Purchased Power (F&PP) Costs - Excluding Fixed & Variable Operations and Maintenance (Unhedged)			
Year	Cost to Serve Assuming Low F&PP Prices (\$000s) (A)	Cost to Serve Assuming Base F&PP Prices (\$000s) (B)	Cost to Serve Assuming High F&PP Prices (\$000s) (C)
2016	\$827,617.3	\$971,235.9	\$1,186,886.1
2017	\$810,065.3	\$971,947.3	\$1,216,782.5
2018	\$846,080.0	\$1,010,256.8	\$1,271,411.5

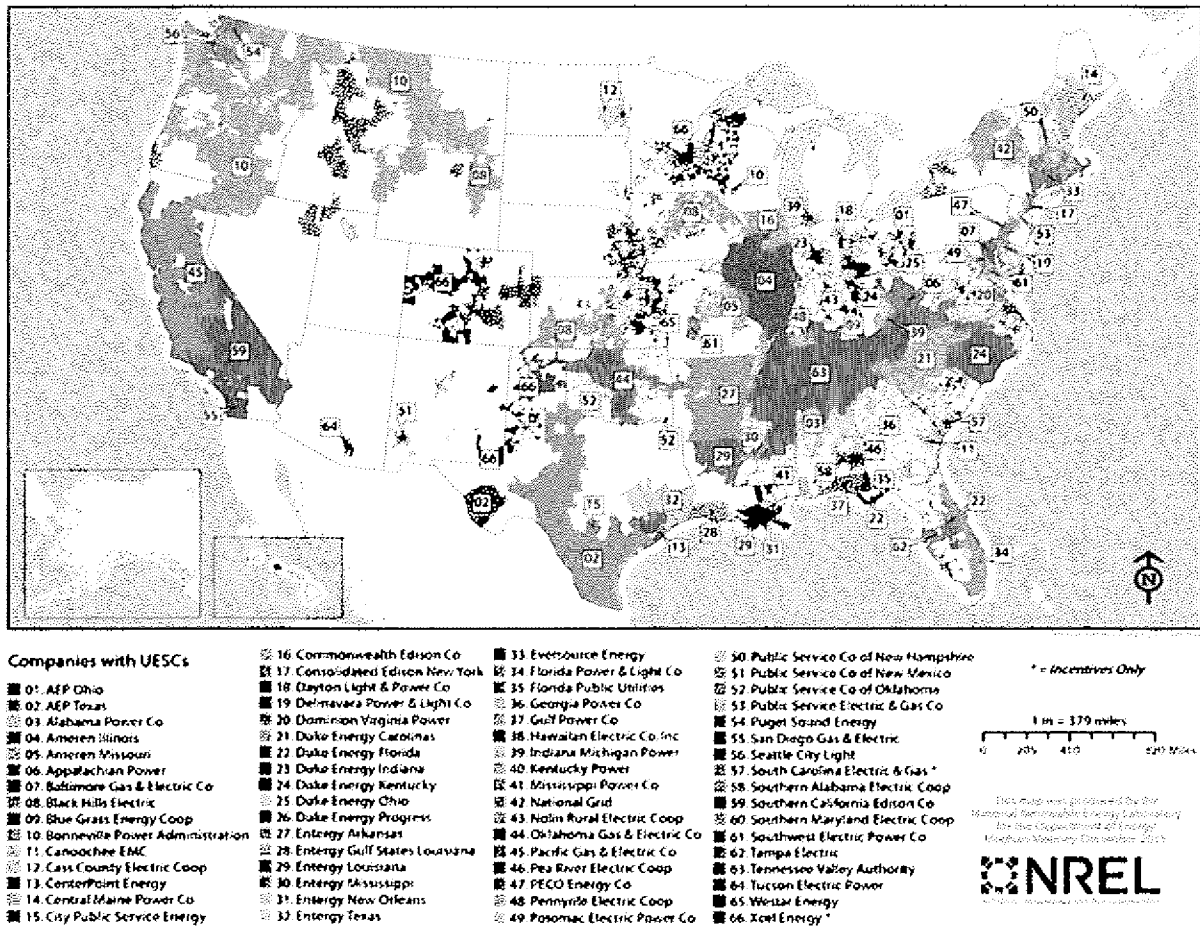
The Company also calculated the projected Base Tariff Energy Rates ("BTERs") and Deferred Energy Accounting Adjustment ("DEAA") rates for 2016-2018 under the low, base, and high fuel and purchased power price forecasts. The projected BTER and DEAA rates, along with estimated carrying charges, are presented in Technical Appendices. The expected cost to serve and forecasted rates are expected to remain within a reasonable band under the Company's proposed procurement strategies. This ESP optimizes the value of the overall supply portfolio of the utility for the benefit of its bundled retail customers. The Company will continue to monitor and adjust the power portfolio. By monitoring the portfolio, Nevada Power can identify and account for changes in load, cost, volatility, reliability, and other commercial or technical factors. Day-ahead or day-of power purchases are expected to be made if there is an open position, or if system costs of decremental

energy exceed the additional cost of market purchases. Similarly, day-ahead or day-of power sales are expected to be made as opportunities appear, including spot, fixed price, or indexed agreements as specified in the Energy Risk Management and Control Policy. The Company also intends to continue to issue reverse RFPs for the prospective forward sale of heat rate ("HR") call options, as specified in the Portfolio Optimization Procedures Manual. This ESP does not contain any feature or mechanism that would impair the restoration of the creditworthiness of the utility or would lead to a deterioration of the creditworthiness of the utility. Over the past several years, the Commission has implemented an energy supply planning process, and the Company's credit has improved. Currently, the Company can provide financing for this ESP without impairing its creditworthiness, assuming timely recovery under current rate recovery mechanisms.

1. **POWER PROCUREMENT PLAN** Based on the ESP Forecast, Nevada Power has open capacity positions of 238 megawatts, 71 megawatts, and 845 megawatts in July 2016, July 2017, and July 2018, respectively. The Company is not recommending any firm products to fill these open positions at this time, but will continue to monitor the portfolio as the need for potential additional capacity approaches. The Company intends to explore market-based solutions to address the 2018 open capacity position, contingent on the resolution of pending 704B exit applications, and present an updated plan to the Commission in next year's Energy Supply Plan Update. Nevada Power continuously monitors the portfolio and market conditions and will seek to make short-term and forward Page 30 of 39 purchases when economic or needed to serve native load. Any proposed purchases of greater than three years in duration will be submitted to the Commission for approval in accordance with NAC 704.9113 and 704.9512. Similarly, Nevada Power monitors the portfolio seasonally, monthly, weekly, daily, and hourly, and when economic conditions change, it seeks to make short-term and forward sales of resources not expected to be needed to serve the native load. The Company will continue this practice over the ESP period. The Company fully anticipates meeting its RPS credit obligation throughout the ESP planning period. The plan presented in this ESP incorporates the current regulations governing the company's ability to use renewable credits to meet the RPS and the calculation of the renewable energy credits. The current Nevada Revised Statutes limit the company's ability to use credits from energy efficiency measures to meet its credit requirement under the RPS starting in 2015 (NRS 704.7821); eliminates credits from station service for non-geothermal systems placed into service after January 1, 2016 (NRS 704.78215), and

eliminates the 2.4 solar credit multiplier for photovoltaic systems that are placed into service after December 31, 2015 (NRS 704.7822). The plan also contemplates that Nevada Power will resume repaying its outstanding credit obligation to the joint pool for the benefit of Sierra with payments starting in 2017.

Electric Utilities Offering UESCs to Federal Facilities



About This Map »

Click on the links below to switch layers on and off

PROPOSED LINES

☒ Solar power transmission lines

EXISTING CAPACITY

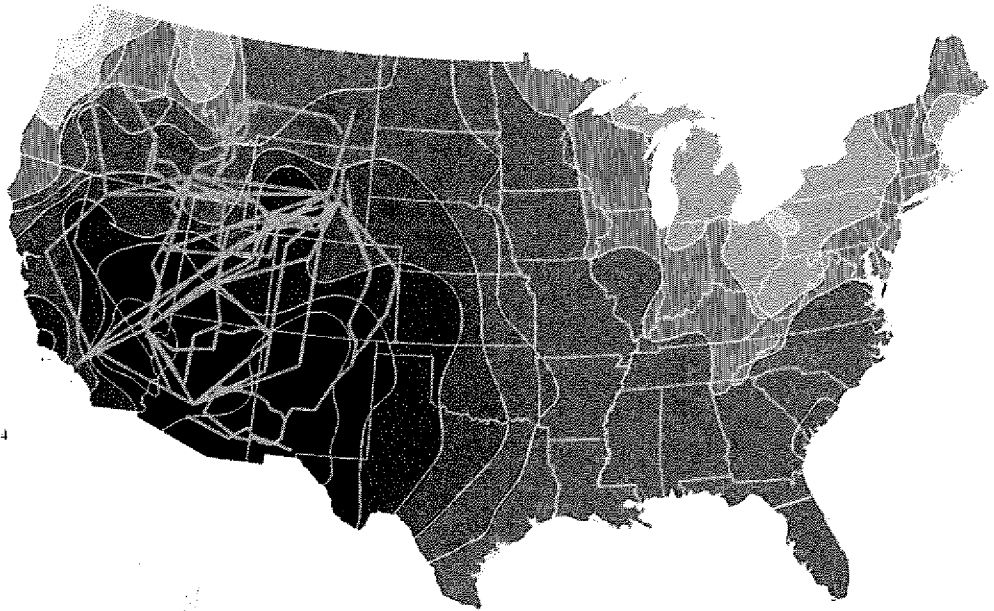
Solar power capacity

In MW (as of 2012)

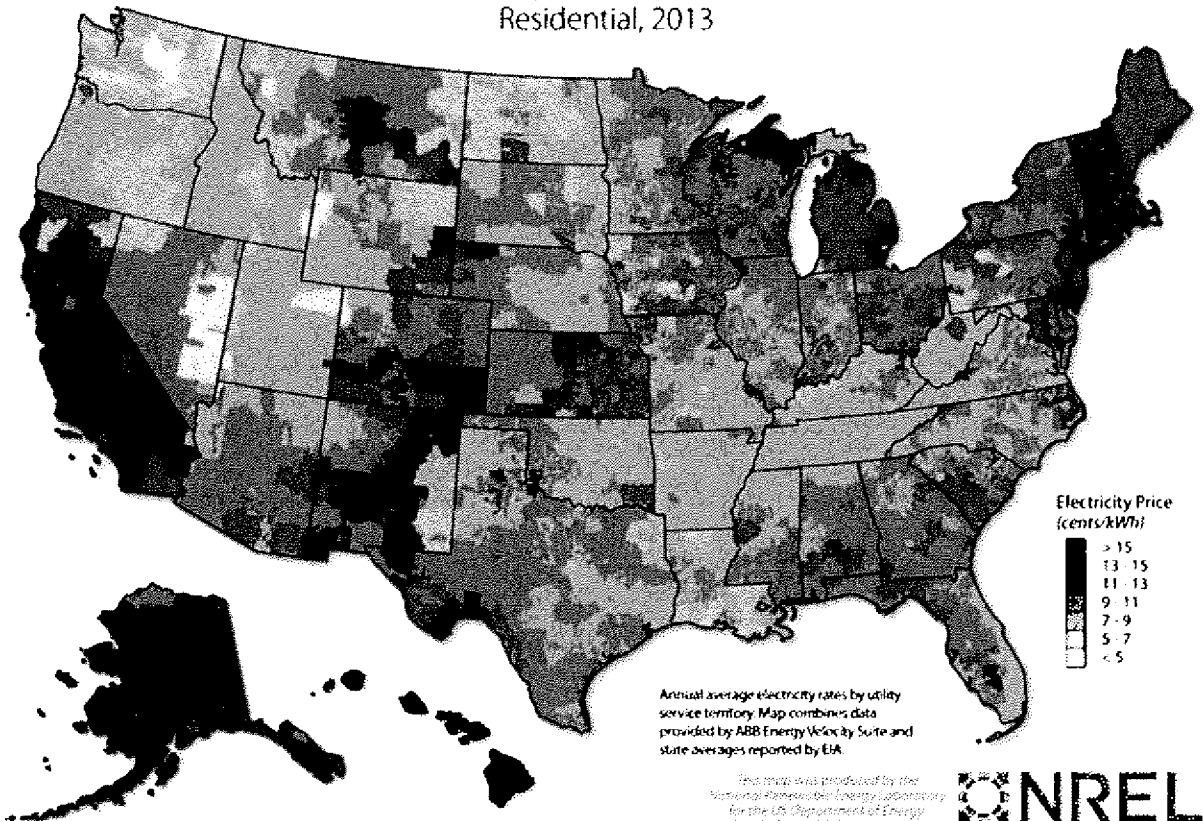
	260		180
	248		173
	235		161
	223		149
	211		136
	198	112-124	

No data

EXISTING LINES



Electric Rates Residential, 2013



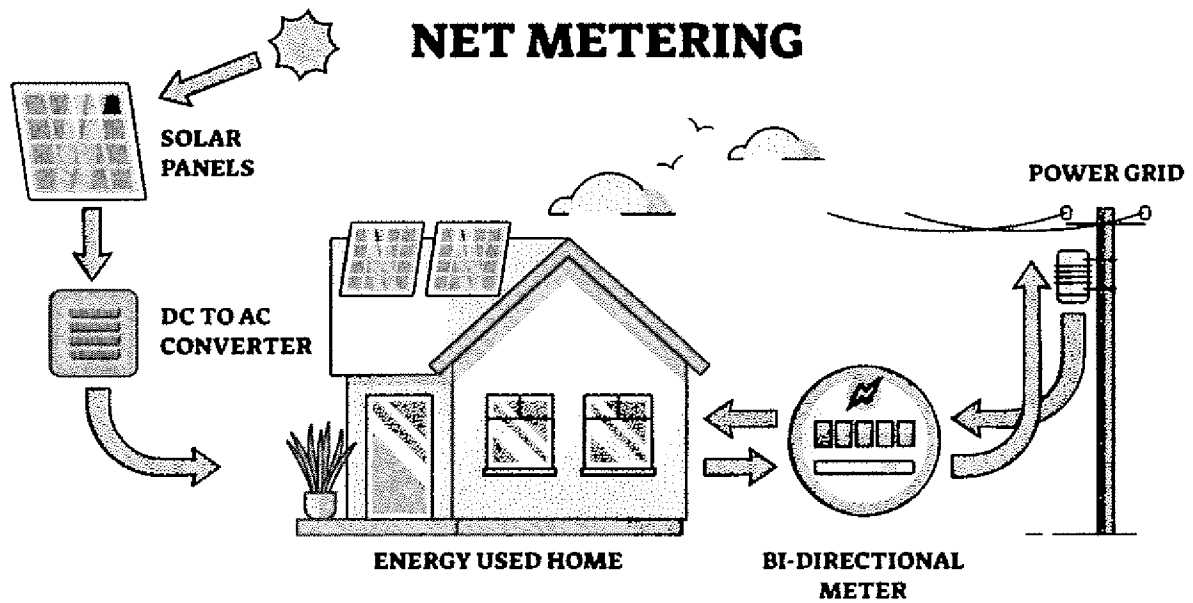
Electricity Price
(cents/kWh)

	> 15
	13-15
	11-13
	9-11
	7-9
	5-7
	< 5

Annual average electricity rates by utility service territory. Map combines data provided by ABB Energy Velocity Suite and state averages reported by EIA.

This map was produced by the National Renewable Energy Laboratory for the US Department of Energy. City & Roberts | February 26, 2016

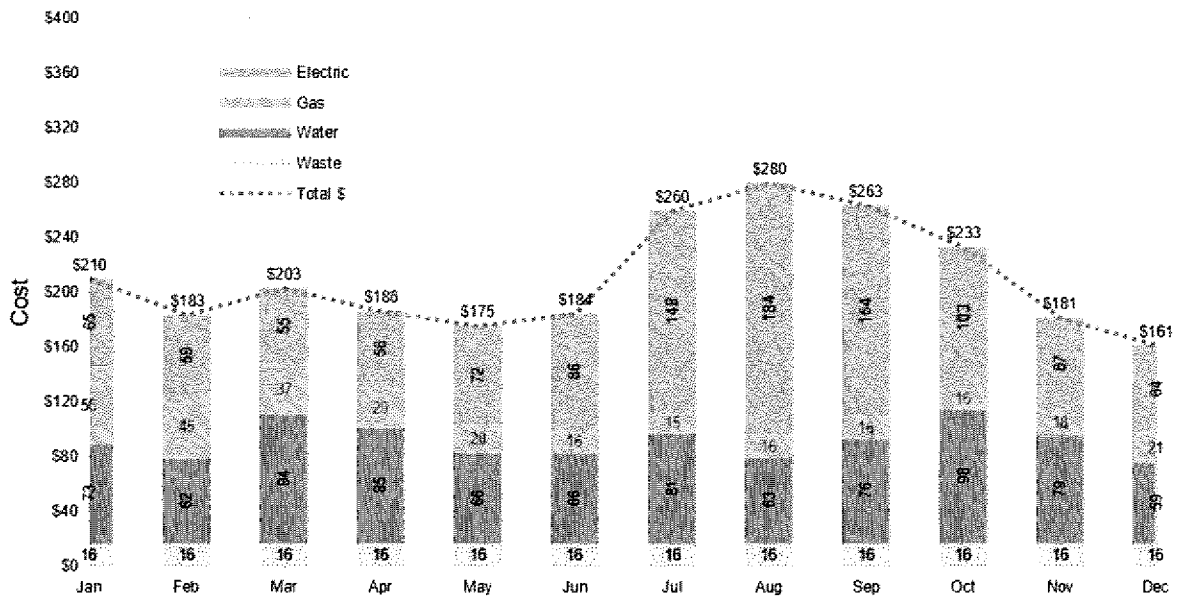
NREL
NATIONAL RENEWABLE ENERGY LABORATORY



ENERGY SAVINGS, LOCAL JOBS WOULD
GIVE NEVADA A BOOST

Only for Construction Workers

Henderson -NV- Utilities-2021 -\$2519.32 2 story house 2600sqft w/pool spa 10KGals



Why is Nevada in danger of losing its solar industry?

By Steven Bushong | January 13, 2016

One of America's sunniest states, Nevada, is shutting its door on the solar industry.

A decision by the Nevada Public Utilities Commission (PUC) to burden past, present, and future solar customers with steep fees and inequitable price structures has thrown the state's industry into disarray. As advocates, hopeful for relief, try to convince the PUC that its decision is wrong, solar customers and businesses alike are struggling to make sense of the decision's economic impact.

The PUC's decisions could eliminate the grid-tied residential and commercial solar business in Nevada, according to interviews with solar installers in the state. It could even make sense, in some situations, for current solar owners to unplug entirely and let their systems collect dust instead of sunlight.

At issue is net energy metering (NEM) and the rates and fees solar customers within the NV Energy utility territory must pay to take advantage of the program. NV Energy services most of the state's most populated areas, including Las Vegas, Carson City, and Elko. In short, the PUC's decision makes residential and commercial solar in the state prohibitively expensive, with payback periods on some systems extending longer than solar equipment is typically warranted to function. The smaller the system, one analyst said, the longer the payback period could be.

The impact was surprisingly negative, said Kyle Jones, analyst at Robco Electric.

"If you look at the paperwork that was filed with PUC, everyone was expecting a grandfathering of old customers, and we weren't expecting future solar customers to be so devastated with these rates," he said. "We thought there might be a \$10 or \$20 fee, but not a [nearly] \$40 fee, and that the excess energy rates would be slashed so dramatically.

"We thought we could continue business, but it just wouldn't be so fruitful. We thought we were going to take a hit on business, but could keep everyone working."

Perhaps the most disturbing element of the commission's ruling is that it's retroactive, failing to grandfather old systems, impacting thousands of existing solar customers in the state.

As a result, companies have already laid off workers, new solar orders have ground to a stop, and the financial impact of the decision on solar owners is just now becoming known.

"Once word gets out how bad this is for existing customers, it's going to shake the ground everywhere," Jones said.

Making sense of the decision

This decision dates back to March, when state legislators, through HB 374, empowered the PUC to create a new class of customers that use solar panels. In a political swap to raise the net metering cap, it also enabled the PUC to increase fees on solar customers for using the grid.

In December, the commission voted to allow NV Energy to increase a monthly fee on solar customers (working out to about \$38 each month by 2020) and reduce the credits customers receive for excess energy from about \$0.11/kWh to \$0.02/kWh—a reduction from the retail rate, which is what utility customers pay for energy, to the wholesale rate, which is what the utility itself pays for energy.

The change was needed, according to NV Energy, due to cost-shifting. Cost-shifting describes the benefits solar users get from the grid while paying nothing or little to support electricity infrastructure, shifting the cost to other non-solar customers.

Today, a debate rages about the true nature of cost-shifting and how much solar users really burden the system, if at all. Several studies have shown that solar users can be a benefit to utility grids. Lauren Randell, manager of public policy at Sunrun, said the idea that solar users create a cost shift has been discredited by every independent study across the country, including one in Nevada.

“The PUC commissioned a study to look at the costs and benefits of rooftop solar,” she said. “What the study found—which somehow doesn’t get any air time in the press—is that solar is a net benefit to rate payers.”

NV Energy, arguing the PUC study didn’t provide accurate results, commissioned its own. The utility-funded study found, to little surprise among observers, a significant cost shift created by solar users. That study has informed the PUC and its latest decision, bringing the state’s solar industry to the edge of its demise.

Impact on customers

For solar customers and companies alike, the most disturbing aspect of the PUC decision is that it applies retroactively, meaning people who purchased solar expecting a certain return can throw out those calculations altogether.

“Now all of this stuff is so backward,” said William Ramsdell, president of American Solar Electric—a company primarily dealing in solar-powered LEDs—and owner of a solar array. “People who have solar are now going to be charged more money, more money per kWh, for energy than their next-door neighbor who doesn’t have solar ... that’s ludicrous.”

Louise Helton, co-founder of 1 Sun Solar and an outspoken advocate, said the PUC misled the public to believe that rate changes would not impact current customers. She said solar leases are likely to become a financial liability under the new rules, rather than an advantage.

"At the end of the day, most of the leasing companies are only saving customers \$20 to \$30 a month, and by 2020, just the monthly fee will be \$38 a month," Helton explained. "And when you take into consideration that they'll be valuing excess energy at such a low rate, if you're leasing, you're so upside down, it will cost you thousands of dollars more than it would have cost you if you hadn't had solar at all."

Jones of Robco Electric has been tinkering with the new fees and rate structures for days, applying them to real properties and testing the outcomes. To help customers understand the impact of the PUC decision, he developed a web-based calculator [available here](#). Under one calculation, a customer would have saved about \$5,417 by going solar, but with the new NEM rules, the customer will spend \$6,422.64 to \$17,846.12 more than people who did not go solar.

Another test Jones ran was based on his own boss's system, a 4.14-kW array with 98.7% offset. If it had been purchased last year and installed at \$3.57/W (about the installed cost of most residential systems, according to SEIA), the return-on-investment (ROI) would have been seen in 2027. With the new fees and reduction in credits for excess energy from NV Energy, payback is shifted to 2058, Kyle said.

"This most definitely means we won't do rooftop systems in Nevada anymore," Jones said. "There will be some people who want to do it, but in reality, it will kill everybody."

"We'd have to be at 1.50/W to install this system and give them the same payback if you did it right now. It'd be closer to \$1/W install cost after all the fees are put in place by NV Energy."

Impact on Business

SolarCity and Sunrun, two of the largest solar-lease companies in the country, recently halted business in the state because of the devastating policy decision. Vivint Solar also paused operations this summer, citing policy uncertainty.

SolarCity's move will reportedly cost 550 jobs, a quarter of its workforce, subduing an industry that was rejoicing a five-year extension of the solar's federal investment tax credit just a few weeks ago. The true impact of the PUC's decision, which is likely to be contested, is yet to be seen.

"This is a very difficult decision, but Governor Sandoval and his PUC leave us no choice," SolarCity CEO Lyndon Rive said in a scathing news release announcing the decision to leave the state. "The people of Nevada have consistently chosen solar, but yesterday their state government decided to end customer choice, damage the state's economy, and jeopardize thousands of jobs."

Sunrun offered similar words about its decision to leave the state, which ranked third in solar installations in 2014.

"Nevada passed incentives to attract residents to go solar. But after baiting homeowners with incentives, the state switched the rules, penalizing solar homeowners to deliver additional profit to NV Energy," said Bryan Miller, senior vice president of public policy and power markets at Sunrun, in a news release. "This bait and switch hurts Nevada families, many of whom are retirees on fixed incomes, and who use solar savings to meet their monthly budgets."

The decision isn't just impacting the larger, headline-generating companies like SolarCity and Sunrun. Nevada is home to more than 100 solar companies, according to SEIA—companies with smaller workforces and trusting clients. Workforces have already been laid off, according to interviews, and solar customers are growing wary as news about the decision spreads.

"My customers are not pleased about the fees and decreased sell-back rate," said Jim Korzeniewski, owner of High Desert Electric. "Some are considering action against me. [I'm] not sure what to do as far as a plan."

Moving forward

Randall, who also participated in the advocacy group The Alliance for Solar Choice, said Sunrun will be filing suit against the PUC's action in court. The Bureau of Consumer Protection is also filing motions to stay the PUC's decision. Other organizations,

including the Southern Nevada Home Builders Association, have come out against the decision, as well.

"[Nevada] could be a state that's a net exporter of solar energy. It has the highest potential to be a leader in solar. Last year, it had the highest level of solar jobs per capita in the country," Randall said. "But now, because of this political decision, it will be one of the last states for solar in the country, which is just sad."

The PUC met with solar advocates related to SolarCity today in Carson City to hear concerns. The author of HB 374, which allowed the PUC to make this decision, has expressed concerns herself.

State Senator Patricia Farley, the legislation's lead author, told Bloomberg Business she is "absolutely concerned" about the decision and did not expect two major solar companies to leave the state as a result.

"I'll have to take a look at the numbers," Farley told Bloomberg. "I have to assume that the PUC would do the right thing. People who already had solar relied on the old rate structure. They should have a remedy."

Helton suggested a compromise.

"I don't want to be unreasonable, and I certainly don't expect everything to go my way 100%," she said. "We could come up with a flat monthly fee of \$20 to \$25, maximum. I think that for small residential customers and small commercial customers, we could still manage that, and people would be satisfied with their investments and want to go forward. But this very one-sided decision that has been made will not serve to encourage anyone, and it will be very damaging."

Update, January 14:

After hearing hours of testimony from solar advocates on January 13 in Carson City, the Nevada PUC decided to uphold rate hikes. Read an article about this decision [here](#).

Nevada PUC denies request to stay solar net metering reforms

Published Jan. 14, 2016

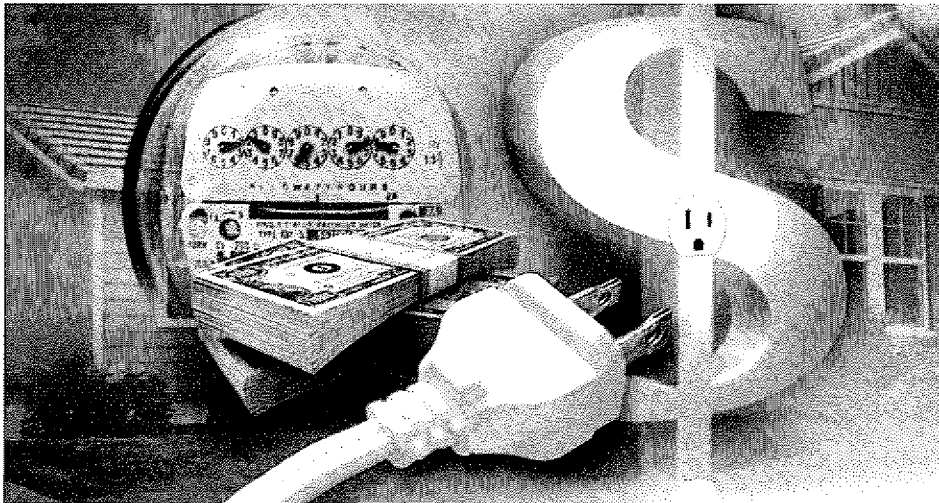
By

Krysti Shallenberger Editor

Dive Brief:

- The Public Utilities Commission of Nevada on Wednesday unanimously voted against requests to delay implementation of controversial changes to net metering remuneration rates and fixed fees for rooftop solar customers, the Associated Press reports.
- Rooftop solar customers and installers had requested that the commission put a stay on the new rates and charges, which the commission retroactively applied to existing solar systems, as well as new ones. Ahead of consideration of the stay, Commissioner David Noble filed a draft order urging his colleagues to resist calls to delay implementation of the rates, which were set to go into effect on Jan. 1.
- PUC Chair Paul Thomsen said while the Commission was saddened by layoffs in the solar sector attributed to the reforms, they were trying to decide to “create a path forward” for rooftop solar users that treated all ratepayers equitably.
- **Dive Insight:**
- The Nevada regulators’ decision to implement new net metering rates and fees for rooftop solar users has sparked an exodus from the state by major solar developers and calls from celebrities and presidential candidates to delay or reverse the ruling.
- In December 2015, the Commission unanimously approved a new solar net metering rate that decreases the rate paid to rooftop solar customers for the power they export to the grid. The regulators also created a separate rate class for all small commercial and residential net metering customers as well as a time-of-use pricing option. The new order would also include an increase in fixed charges alongside a decrease in the volumetric commodity charge designed to recoup costs from net metering customers.
- The new rates will increase the monthly charge for NV Energy customers with rooftop solar from \$12.75 to \$17.90 per month in the first year of the phased increase, and they will eventually reach \$38.51 at the end of five years. The NEM credit for present and future solar owners would fall from \$0.11/kWh to \$0.09/kWh in the first year and then, progressively, to \$0.026/kWh in 2020.
- In response, SolarCity and Sunrun announced that they would withdraw their operations from the state, with SolarCity announcing that it would lay off 550 employees.
- Nevada’s solar market has grown quickly in recent years, setting off a fierce debate between the state’s major utility, NV Energy, and solar advocates as the rapid expansion of solar installations maxed out the state’s 235 MW net metering cap in 2015.

- The state's Legislature directed utility regulators in May 2015 to develop a new solar tariff that satisfies both sides by the end of the year. NV Energy, the state's dominant electric utility, proposed to lower the remuneration rates for solar customers and increase fixed fees, arguing that net metered customers don't pay their fair share to maintain the grid.
- Stakeholders had anticipated hitting the net metering cap by early 2016, despite warnings by The Alliance of Solar Choice (TASC) that the quick pace of solar PV installations would mean the cap would be hit earlier than the projected timeline.
- The net metering cap was reached in August, which temporarily halted solar installations and prompted Vivint Solar's exit, the first of three. The PUC, which earlier had rejected solar advocates' pleas to extend the cap by saying it was under the legislature's purview, voted unanimously to keep current rates in place through the end of the year before settling on the new net metering policy.
- The AP reports that petitions were filed last week requesting extensive reconsideration of the new net metering rates. The next meeting of the Nevada PUC is slated for Jan. 25.



NV Energy Northern Nevada concerns 2025

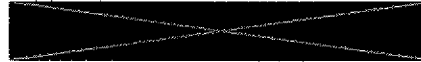
- 1- Net Metering Accounting.**
- 2- Where is my NV Energy Account showing Money Accumulated?**
- 3- My 20-year (ROI) Return on Investment.**
- 4- NV Energy Outages increased dramatically from 2016 to 2025. Reasons for outages?**

1-Net Metering Accounting.

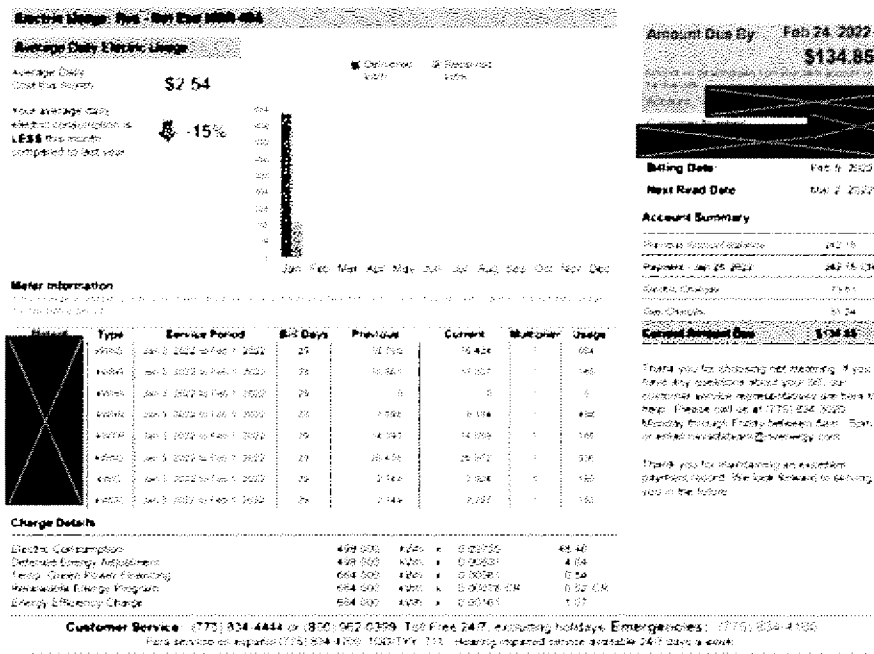
Doug Cannon, the former President and CEO of NV Energy, resigned from his position in May 2025. This departure came during a regulatory investigation by the Public Utilities Commission of our state for allegations that NV Energy overcharged thousands of its customers.

NV Energy overcharged tens of thousands of residential customers by at least \$17 million between 2017 and 2024. NV Energy returned less than \$2 million in refunds.

Cost of NV Energy Electric from 2017 to 2025 a



Account



Three meters on statement in Feb 2022.

Electric Usage: Res - Hot End 9888-444

Average Daily Electric Usage

Average Daily
Cost this month

\$0.56

Delivered
15¢/kWh
Reserved
41¢/kWh

Your average daily
electric consumption is
LESS this month
compared to last year

-23%



\$146.80 CR Excess Energy Credit carries over previous balance
\$5.00 CR Excess Energy Credit waived this billing period
\$71.80 CR Excess Energy Credit applied to the current applicable charges
\$146.80 CR Excess Energy Credit carries over current balance

Water Information

Water usage is shown in cubic feet (cfs) and gallons (gals). Water usage is shown for the current billing period and the previous billing period.

Meter	Type	Service Period	Bill Days	Previous	Current	Multiplier	Usage
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	4,759	5,075	1	289
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	5,075	5,394	1	96
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	0	0	1	0
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	1,504	2,061	1	243
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	2,061	2,379	1	47
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	2,379	2,697	1	476
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	2,697	3,015	1	589
XXXX	XXXX	Jan 2, 2020 to Jan 31, 2020	29	3,015	3,333	1	587

Charge Details

Customer Service: (775) 834-4444 or (800) 962-6339. Toll Free 24/7, excluding holidays. Emergencies: (775) 834-4100.

Hours of service are 8:00 a.m. to 5:00 p.m., Monday through Friday. Service is available 24/7 days a week.



Customer Number: 1055360

Service
Address

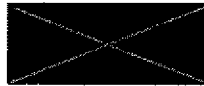
Amount Due By: Feb 24, 2020
\$76.12

Do Not Send Payment

The above amount will be withdrawn from
your bank account on the due date.



Three meters on statement in Feb 2020.



E A37 BU7

[Faint handwritten notes at the bottom of the page]

Usage in total electric kilowatt hours

■ Depressed + with ■ Not depressed + with

Year	Number of Publications
1985	1000
1986	1200
1987	1400
1988	1600
1989	1800
1990	2000

Amount Due By **Feb 24, 2025**

\$158.89

Account will be withdrawn from your bank account on the due date

Account Summary

Important Messages

Thank you for maintaining an excellent payment record. We look forward to serving you in the future.

If NV Energy is unable to read your meter because of circumstances beyond control, you may be billed based on estimated usage for that billing period.

Type	Service Period	B14 Days Previous Read	Current Read	Mult	Usage
KWHD	01/02/25 to 01/03/25	29	30,817	1	625
KWHR	01/02/25 to 01/03/25	29	27,528	1	4
KWHA	01/02/25 to 01/03/25	29	0	0	0
KWHE	01/02/25 to 01/03/25	29	13,774	1	621
KWHL	01/02/25 to 01/03/25	29	25,063	1	4
KWHG	01/02/25 to 01/03/25	29	56,130	1	473
KWIC	01/02/25 to 01/03/25	29	9,735	1	176
KWDC	01/02/25 to 01/03/25	29	8,064	1	151

Electric Consumption	621,090	kWh	x	0.11329	\$70.35
Temp. Green Power Financing	625,000	kWh	x	0.03932	\$2.43
Renewable Energy Program	625,000	kWh	x	0.03989	\$2.46
Energy Efficiency Change	625,000	kWh	x	0.02232	\$1.45
Natural Disaster Protection Plan	625,000	kWh	x	0.02207	\$1.29

Downloaded from <http://ajphaphapublications.org/> on 06/05/2015

Customer Service: (775) 834-4444 or (800) 962-0339 Toll Free 24/7, excluding holidays. Emergencies: (775) 834-4100
Para servicio en español (775) 834-4700 TDD/TTY: 711 Hearing impaired service available 24/7 days a week.



Amount Due By:	Feb 24, 2025
	\$158.89

Do Not Send Payment

2-Where is my NV Energy Account showing Money Accumulated in 2025? Fraud or NVENERGY Accounting change?

3-My 20-year (ROI) Return on Investment.

ENERGY Electric COST	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	CREDIT 2018	credit 2019	CREDIT 2020
JAN	82.62		\$108.32	\$66.06	\$15.05	\$12.85	\$173.27	\$16.37	\$17.57	\$106.22		\$140.04	\$119.48	\$69.13
FEB	96.38		\$98.56	\$47.88	\$16.12	\$14.24	\$73.61	\$17.52	\$17.56	\$97.33		\$167.67	\$119.40	\$80.83
MAR	135.07		\$92.28	\$51.07	\$16.12	\$16.12	\$34.01	\$37.19	\$27.11	\$40.87		\$148.04	\$94.92	\$78.12
APR	157.18		\$87.34	\$16.16	\$16.15	\$16.15	\$15.87	\$75.85	\$29.41	\$55.89		\$150.53	\$103.05	\$75.58
MAY	162.64	\$95.58	\$81.67	\$16.13	\$16.11	\$16.11	\$15.87	\$17.17	\$17.37			\$139.39	\$59.31	\$66.84
JUN	167.79	\$70.47	\$70.11	\$23.94	\$16.12	\$16.14	\$15.90	\$17.34	\$17.36				\$47.82	\$50.00
JUL	174.2	\$100.11	\$85.87	\$16.10	\$16.14	\$16.22	\$15.91	\$17.33	\$17.40					\$40.76
AUG	168.16	\$120.11	\$127.85	\$16.13	\$16.22	\$14.73	\$15.87	\$17.39	\$17.43					\$39.43
SEP	153.57	\$105.68	\$108.63	16.12	\$16.16	\$14.73	\$15.82	\$17.36	\$17.42			\$152.24		\$39.49
OCT	127.39		\$88.30	\$16.11	\$16.19	\$14.84	\$15.84	\$17.36	\$17.46			\$132.39	\$38.29	\$37.32
NOV	93.45		\$79.19	\$16.07	\$15.20	\$15.50	\$15.65	\$17.36	\$19.22			\$113.21	\$40.61	\$37.47
DEC	81.78	\$108.12	\$76.88	\$15.34	\$13.31	\$13.31	\$16.19	\$17.45	\$18.01			\$104.99	\$55.15	\$40.11
PER DAY sum	44,299kWh	1600.23	600.47	\$1,804.60	\$316.11	\$188.89	\$180.94	\$423.81	\$285.89	\$233.32				
INVE INCENTIVE	\$1,485.00													
	Saved	\$1,000.00	w/o pw	with pw	with pw	with pw	with pw	with pw	with pw	with pw				
	Total		\$500.00	\$1,300.00	\$1,412.00	\$1,420.00	\$1,369.00	\$1,500.00	\$8,500.00	\$11,500.00				
COST \$25,000.00														
Roof \$5,600.00														
Saved \$6,000.00														
/ENERGY GAS COST	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025				
JAN				\$54.34	\$66.78	\$51.16	\$66.88	\$100.88	\$98.45	\$58.60				
FEB				\$47.02	\$60.00	\$51.80	\$61.24	\$105.13	\$91.04	\$61.67				
MAR				\$58.25	\$51.98	\$59.42	\$56.80	\$95.40	\$93.00	\$57.10				
APR				\$52.25	\$43.15	\$50.89	\$46.79	\$82.12	\$84.94	\$48.75				
MAY				\$17.34	\$11.47	\$13.89	\$46.33	\$65.22	\$51.46					
JUN				\$27.17	\$27.58		\$32.47	\$44.71	\$36.99					
JUL				\$24.36	\$24.62		\$23.24	\$32.43	\$32.40					
AUG				\$24.59	\$23.27		\$28.35	\$32.40	\$23.35					
SEP					\$21.16	\$24.45	\$24.59	\$30.35	\$23.89					
OCT				\$24.91	\$24.50	\$21.57	\$24.94	\$25.34	\$33.34	\$25.05				
NOV				\$25.80	\$39.08	\$24.91	\$33.57	\$43.48	\$31.71					
DEC	\$38.89			\$14.80	\$53.79	\$44.70	\$44.70	\$80.74	\$75.92	\$55.52				
SUM				\$349.15	\$348.63	\$432.97	\$230.02	\$494.27	\$741.40	\$647.80				

NV ENERGY Statements in 2025 do not credit my account for the NET-METERING 405 Agreement signed in 2018?

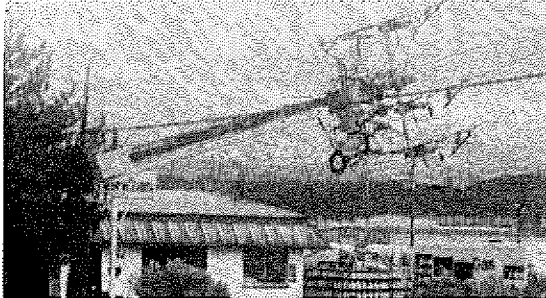
Why are January to August in 2025 different than 2019 through 2024? +Net-Metering C meter was and Net-Metering 405 was omitted from the 2025 NVENERGY Statements!

4-The NV ENERGY Outages increased from 2016 to 2025

NV ENERGY RESIDENTIAL POWER OUTAGES IN SIX YEARS-

From 2016 to 2025, NV Energy outages at my home in Sun Valley increased from one hour and thirty-three minutes to TEN hours. The Tesla App has recorded all these residential outages.

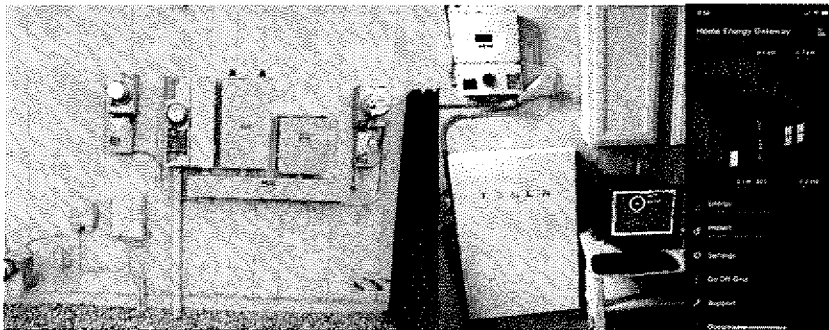
In 2025, the outages increased to several weeks for 30,000 customers in Las Vegas due to wind loading on utility poles.



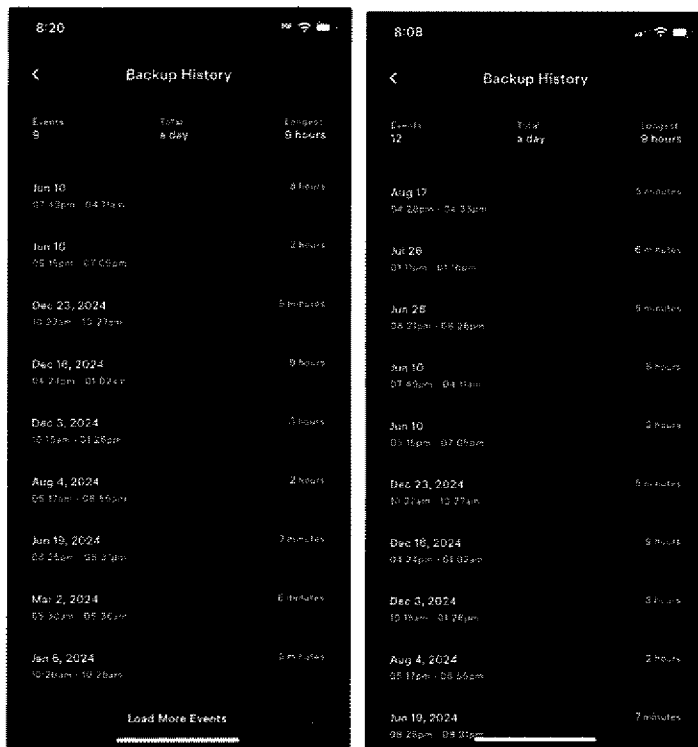
IN THE SIX YEARS OF TESLA SOLAR WITH OUR POWERWALL TWO, WE HAVE NOT LOST POWER TO OUR THREE REFRIGERATORS AND ONE FREEZER until 2025.

OUR TWO COMPUTER WORKSTATIONS AND TELEVISION SYSTEM ALL HAVE A UPS. Uninterrupted Power Supply UNITS TO PREVENT UTILITY POWER SURGES FROM DAMAGE. BEFORE THE UPS INSTALLATION, TWO FLAT SCREENS FAILED AFTER POWER SURGES.

WE HAVE A TRANSFER SWITCH IN THE TESLA ELECTRICAL PANEL THAT WILL CHANGE OUR ELECTRIC LOAD FROM NV ENERGY TO OUR POWERWALL. THE TESLA POWERWALL WILL PRODUCE A CLEAN AC SINE WAVE WITHOUT HARMONIC DISTORTION.



Tesla App Recorded NV Energy Outages in 2024-2025



Hi Alan,

Thank you so much for meeting with me the other day. To summarize:

Date	Duration	Cause
6/10/2025 – 6/11/2025	8hrs 15min	Pole Fire
6/10/2025	1hr 43min	Fire Encroachment
12/16/2024-12/17/2024	8hrs 36min	Burnt Pole Top
12/03/2024	3hrs 4min	Unknown
8/04/2024	1hr 31min	Broken Equipment Arm

From the outages team:

"Looks like only 2 outages this year, long ones though. With the new Fire season settings and EDEN's this year, it's been a rough year for outages in that area. Before the 8/2024 outage, the last one was in 2021."

As discussed during our recent call, your energy consumption in 2024 was approximately **2,603 kWh**, and so far in 2025, you have used **1,393 kWh** (see kWhN on the spreadsheet). Based on this usage, you could technically add approximately **four additional 400W solar panels**. Please note that doing so may require transitioning to a new rate tier. Currently, **Tier 4 compensates at 75%** for each kilowatt exported to the grid.

Alternatively, since your primary concern is related to **power outages**, you may want to consider adding a **second battery** to enhance backup capacity while maintaining your current rate structure.

I've scheduled a follow-up meeting to further discuss these options and help determine the best path forward.

Please let me know if you have any questions in the meantime.

Best regards,

Diego Tapias P.E.

Senior Engineer II

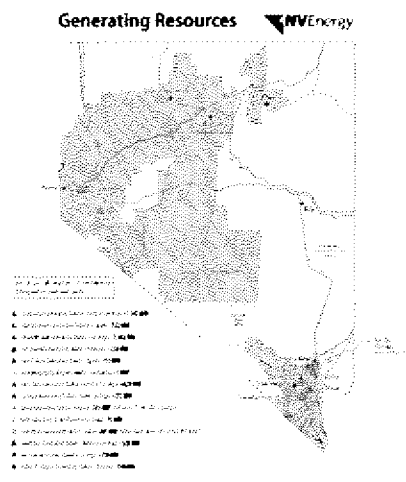
Renewables

Diego.Tapias@nvenergy.com

Office: (702) 402-2116

Cell: (702) 217-7262

We opted to use an OFF-GRID Camping Solar Panel and Battery with an AC outlet for occasional oxygen units, because we would lose our Net-Metering rate from NVENERGY and increase our (ROI).



PG&E <https://www.pge.com/en/newsroom/press-release-details.a1fb9093-4a89-4230-8b2e-e9813f584c7e.html>

PG&E Decreases Residential Electric Rates on Sept. 1; Customers Receive California Climate Credit on October Electric Bills

PG&E Electric Rates Decline While National Prices Forecast to Rise through Next Year

OAKLAND, Calif., Sept. 2, 2025 /PRNewswire/ -- Electric rates for all Pacific Gas and Electric Company (PG&E) residential customers decreased by 2.1% on September 1. For the typical residential customer who uses 500 kilowatt hours a month and does not receive discounts, monthly bills will decrease by about \$5.



*Pacific Gas and
Electric Company*

Electric rates decreased because PG&E has completed a number of projects to increase wildfire safety and respond to emergencies. These temporary costs were removed from rates, helping to lower bills.

In addition to the electric rate decrease, residential electric customers will also receive a \$58.23 credit from the California Climate Credit during their October billing cycle.

PG&E is working hard to stabilize electric prices through company-wide savings programs and is working to lower financing costs. Residential electric rates have dropped three times over the past 15 months, which offset increases over that time, and rates are expected to go down again in 2026.

"While we continue making progress to stabilize electric prices for our customers, we know there is more work to do," said Carla Peterman, PG&E executive vice president of corporate affairs and chief sustainability officer.

"Our focus is on making our system safer and more reliable for customers every day, while managing our costs to keep bills as low as possible."

In the last three years, PG&E has saved approximately \$2.5 billion in operating and capital costs by working more efficiently and using new technologies and improved processes, such as using drones to inspect equipment and bundling electric projects into a single scope of work. PG&E has used the savings to do more safety and reliability work for customers more quickly and to offset some costs of that work.

PG&E's efforts to stabilize electric rates are going against the national trend for forecasted electric prices. While PG&E residential electric rates are going down in September and are also expected to decrease again in 2026, the U.S. Energy Information Administration forecasts that national electric prices are expected to increase through 2026, outpacing forecasted inflation.

California Climate Credit

Residential electric customers will receive an October Climate Credit of \$58.23 on their bill. Eligible small business customers also will receive the Climate Credit.

PG&E customers receive the California Climate Credit twice each year, in the spring and fall.

The California Climate Credit is part of the state's efforts to combat climate change and is distributed by PG&E to help utility customers during the transition to a low-carbon future.

September Gas Rate Decrease

The September rate change also includes gas rates decreasing by 0.4%, saving a typical (31 therms/month) residential customer about \$0.39 per month on their energy bill.

Other Ways to Save

PG&E offers other no-cost and low-cost tools to help customers save energy and money.

- Budget Billing averages your energy costs over the last 12 months to determine your monthly payment and avoid seasonal spikes and billing surprises.
- Home Energy Checkup is a free online tool that helps customers assess their energy use and provides customized savings tips.
- HomeIntel is a free energy-saving program that includes a Smart Audit and a personal energy coach. Customers who have lived in their home for more than a year and have a smart meter installed are eligible to participate.
- Savings Finder is a free online tool that gives personalized recommendations for financial assistance, bill management programs, and other resources to ease monthly energy costs.

Financial assistance programs are available for customers who qualify, including:

- California Alternate Rates for Energy (CARE) Program: offers a monthly discount of 20% on gas and an average of about 35% on electric bills (compared to non-CARE bundled customers).
- Family Electric Rate Assistance (FERA) Program: new guidelines provide a monthly discount of 18% on electricity, regardless of household size.
- The Energy Savings Assistance (ESA) Program provides certain energy-saving improvements at no charge.
- PG&E Relief for Energy Assistance through Community Help (REACH): provides up to a \$300 bill credit to help income-eligible customers with past due balances to prevent service disconnections.
- PG&E Match My Payment Program: offers a dollar-for-dollar match, up to \$1,000, for qualifying low-to moderate-income customers to pay past-due bills to prevent service disconnections. Customers must make at least a \$50 payment toward their outstanding bill each time to receive matching dollars.
- Low Income Energy Assistance Program (LIHEAP): a federally funded assistance program overseen by the state that offers a one-time payment up to \$1,500 on past due bills to help low-income households pay for heating or cooling in their homes.

About PG&E

Pacific Gas and Electric Company, a subsidiary of PG&E Corporation (NYSE: PCG), is a combined natural gas and electric utility serving more than sixteen million people across 70,000 square miles in Northern and Central California. For more information, visit pge.com and pge.com/news

© View original content to download multimedia:

multimedia:<https://www.prnewswire.com/news-releases/pge-decreases->

SOURCE Pacific Gas and Electric Company

Clean energy and battery storage for your home

Let PG&E help you install and manage your solar energy system.

Benefits of clean energy

- Reduce your monthly energy bill.
- Help California's energy grid.

- Make an investment that lasts 25 years.
- Improve the resale value of your home or business.

- Help California reduce fossil fuel usage.
- Reduce your carbon footprint.

- Reduce your monthly energy bill.
- Help California's energy grid.

- Make an investment that lasts 25 years.
- Improve the resale value of your home or business.

- Help California reduce fossil fuel usage.
- Reduce your carbon footprint.

65

you can compare options like financing via cash, loan, or lease. Or adding battery storage to see how it impacts your costs and savings. It costs more initially, but you save money over time. Next step, use this information to select a contractor. The best way is to ask neighbors and friends for referrals. You can also check review sites. Be sure to get bids from at least three contractors. The key factors when reviewing bids are the amount of energy your home consumes over a day and the cost of the system per kilowatt hour. Here are some tips for choosing the best bid. One: Compare apples to apples. Get definitions to make sure you're comparing similar items. Two: Dig for details. Each bid should include a full estimate, with all costs included. Three: Ask questions. Get the license number, business history, and at least three recent references. Four: Read the fine print. Sign a contract only if you fully understand it. Make sure it includes warranties and maintenance agreements. Five: Never make a down payment of more than 10% of the contract price or one thousand dollars, whichever is less. This is a California state law. And verify contractor information online. Get more information about going solar online at pge.com/solar.

California Solar Consumer Protection Guide Overview & FAQ

Power your home with solar. Check out the California Solar Consumer Protection Guide for the latest solar energy information & installation requirements.

The California Public Utilities Commission (CPUC) presents the [California Solar Consumer Protection Guide](#). The CPUC recommends that solar providers give out this guide during their first contact with potential customers.

Solar providers submitting applications to interconnect residential solar customers in the service areas of Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), Bear Valley Electric Service (BVES), and PacifiCorp are required to collect customer initials and a signature on the California Solar Consumer Protection Guide.

GETTING STARTED WITH THE SOLAR CONSUMER PROTECTION GUIDE

Interconnection applications with solar contracts signed May 1, 2022, or later must include Version 3 of the guide, whether signed electronically or on paper.

Corrections:

- Version 3 of the Solar Consumer Protection Guide contains outdated information about the federal income tax credit (ITC) on page 13. In August 2022, the federal government increased the ITC from 26% to 30%. Under current law, the ITC will remain at 30% until 2032.

- Version 3 of the Solar Consumer Protection Guide contains a reference to standardized inputs and assumptions for bill savings estimates (see page 19). Please note that the CPUC and CSLB have not yet published an updated Solar Energy System Disclosure Document containing these inputs and assumptions.
- Version 3 of the Solar Consumer Protection Guide contains outdated information about the Net Energy Metering (NEM) program on page 17. NEM has been closed to new enrollment and replaced with the Solar Billing Plan, or Net Billing.

California Solar Consumer Informational Guide

- [Armenian Solar Consumer Protection Guide \(version 3\)](#)
- [Chinese Solar Consumer Protection Guide \(version 3\)](#)
- [Dari Solar Consumer Protection Guide \(version 3\)](#)
- [English Solar Consumer Protection Guide \(version 3\)](#)
- [Korean Solar Consumer Protection Guide \(version 3\)](#)
- [Portuguese Solar Consumer Protection Guide \(version 3\)](#)
- [Spanish Solar Consumer Protection Guide \(version 3\)](#)
- [Tagalog Solar Consumer Protection Guide \(version 3\)](#)
- [Vietnamese Solar Consumer Protection Guide \(version 3\)](#)

CPUC Procedural Background

Decision (D.)16-01-044 directed CPUC Energy Division staff, in collaboration with stakeholders, to consider net energy metering (NEM) consumer protection measures. In September 2018, the CPUC adopted Decision (D.)18-09-044, which establishes a process for creating a solar information packet for consumers. The solar information packet that was created through this process is now called the “California Solar Consumer Protection Guide.” In February 2020, the CPUC adopted Decision (D.)20-02-011, which modifies Decision (D.)18-09-044.

D.18-09-044 requires that solar providers upload three documents before interconnecting a residential solar customer to the electric grid in PG&E, SCE, and SDG&E territories. These documents include: signed pages of the CPUC solar information packet, the solar installation contract, and the [Contractors State License Board \(CSLB\) Solar Disclosure Document](#).

D.18-09-44 authorizes an evaluation of the NEM successor tariff (NEM 2.0). As part of this evaluation, focus groups were conducted about the California Solar Consumer Protection Guide, [version 2](#). The focus group methods and findings are presented in this [Solar Consumer](#)

[Protection Guide Research Findings Memo](#). They are also summarized in these [slides](#) from the public workshop about the study.

The CPUC's Energy Division mailed the following letters regarding the solar information packet to service lists R.14-07-002 and R.12-11-005:

- October 29, 2020: [Energy Division Letter](#) on an extension until January 1, 2021, of the requirement to use the September 2020 version of the Solar Consumer Protection Guide, in compliance with D.20-02-011 OP3.
- September 29, 2020: [Energy Division Letter](#) on an extension until October 30, 2020, of the requirement to use the September 2020 version of the Solar Consumer Protection Guide, and an additional extension until January 4, 2021, for SDG&E to reconfigure its interconnection portal in compliance with D.20-02-011 OP3 and OP4.
- June 5, 2020: [Energy Division Letter](#) on an extension until September 30, 2020, to reconfigure interconnection portals in compliance with D.20-02-011 OP3 & OP4
- January 15, 2020: [Energy Division Letter](#) on additional extension for wet signature requirement.
- September 27, 2019: [Energy Division Letter](#) on 120-day extension for wet signature requirement.
- August 30, 2019: [Energy Division Letter](#) on a time extension for the release of the translated versions of the solar information packet.
- June 14, 2019: [Energy Division Letter](#) on a time extension for the release of the English-language version of the solar information packet.

Solar Complaints Report

The Contractors State Licensing Board (CSLB) compiles and publishes an annual report on complaints and consumer questions received regarding solar energy systems companies and solar contractors. This report can be found on the [CSLB's Solar Smart webpage](#) under "Solar Complaints Report."

List of California Electric Power Providers

Community Choice Aggregators

- **CCAs in PG&E Areas**
 - [Central Coast Community Energy \(3CE\)](#)
 - [CleanPowerSF](#)

- Ava Community Energy (Ava)
- King City Community Power (KCCP)
- MCE Clean Energy
- Peninsula Clean Energy (PCE)
- Pioneer Community Energy (PIO)
- Redwood Coast Energy Authority (RCEA)
- San Jose Clean Energy (SJCE)
- Silicon Valley Clean Energy (SVCE)
- Sonoma Clean Power (SCP)
- Valley Clean Energy (VCE)
- **CCAs in SCE Areas**
 - Apple Valley Choice Energy (AVCE)
 - Central Coast Community Energy (3CE)
 - Clean Power Alliance (CPA)
 - Desert Community Energy (DCE)
 - Energy for Palmdale's Independent Choice (EPIC)
 - Lancaster Energy (LE)
 - Orange County Power Authority (OCPA)
 - Pico Rivera Innovative Municipal Energy (PRIME)
 - Pomona Choice Energy (POME)
 - Rancho Mirage Energy Authority (RMEA)
 - Santa Barbara Clean Energy (SBCE)
 - San Jacinto Power (SJP)
- **CCAs in SDG&E Areas**
 - Clean Energy Alliance (CEA)
 - San Diego Community Power (SDCP)

Investor-Owned Utilities

- Pacific Gas and Electric Company (PG&E)
- Southern California (SCE)

- San Diego Gas & Electric (SDG&E)

Support and Contact

Telephone: 1 (866) 849-8390

E-mail: public.advisor@cpuc.ca.gov

Address: Public Advisor's Office – CPUC

505 Van Ness Ave

San Francisco, CA 94102

Integrated Resource Plan and Long Term Procurement Plan (IRP-LTPP)

<https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning>

Background

This is an “umbrella” planning proceeding to consider all of the Commission’s electric procurement policies and programs and ensure California has a safe, reliable, and cost-effective electricity supply. The proceeding is also the Commission’s primary venue for implementation of the Senate Bill (SB) 350 requirements related to integrated resource planning (IRP) (Public Utilities Code Sections 454.51 and 454.52). It will implement a process for integrated resource planning that will ensure that load serving entities (LSEs) meet targets that allow the electricity sector to contribute to California’s economy-wide greenhouse gas emissions reduction goals.

Evaluating Need

To evaluate need, the Proceeding takes a 10-year-ahead look at

1. System needs (reliability needs of the overall electric system)
2. Local needs (reliability needs specific to areas with transmission limitations)
3. Flexibility needs (such as the resources needed to integrate renewables)

[More Information](#)

More Information on Evaluating Need

The assumptions used in the LTPP evaluation are developed in conjunction with the Energy Commission (which provides the demand forecast) and the California Independent System Operator (which uses the same assumptions for transmission planning). The assumptions are

revised every two years to incorporate changes in the resource mix and revisions to State policies (e.g., higher RPS targets). Current assumptions are hosted on the CPUC website.

The analysis that evaluates need compares demand with existing generation, new resources, and also takes into account the retirements of resources. In addition to forecasting expected resource needs, the proceeding develops information on alternative paths to meeting the state's policy goals, such as increasing distributed generation or energy efficiency expenditures. Each step of the process asks for and incorporates stakeholder feedback.

Authorizing Procurement

When needs are identified, the CPUC authorizes procurement in the form of a Commission Decision.

Procurement Plans

Procurement plans detail what is going to be procured and how it will be done. These plans must adhere to State Policies, including the Loading Order, which mandates that energy efficiency and demand response be pursued first, followed by renewables, and lastly clean-fossil generation. If the procurement plans do not comply with State policies and adequately balance safety, reliability, cost, and environmental goals, utilities are ordered to modify them.

Procurement Rules

IRP Decisions adopt rules that govern the procurement process. These rules are updated biennially and support competitive procurement through various mechanisms.

Applications

Utilities submit proposed long-term procurement via applications. These seek approval of contracts or authority to build utility-owned resources. Stakeholders have an opportunity to file testimony on the utilities' applications and request hearings on disputed issues.

Learn More

For more information on the current IRP proceeding ([R.25-06-019](#)), please view the following materials:

- The recently released [Order Instituting Rulemaking](#), which now serves as the Commission's primary venue for oversight of the IRP process, was designed in ([R.16-02-007](#)) and continued in ([R.20-05-003](#)).

- An overview of the Commission's current IRP cycle (2024-2026) and the planning activities taking place within it can be found here: [Overview of the CPUC's Current IRP Cycle \(2024-2026\)](#).

To join the service list for this proceeding (R.25-06-019), please follow the instructions found [here](#) and complete the Addition/Change to Service List Form.

Questions?

For questions regarding IRP Planning, Modeling, and Need Determination, please contact [Sophie Babka](#).

For questions regarding the IRP Procurement Track, please contact [Steven Shoemaker](#).

For questions regarding IRP Transmission Planning, please contact [David Withrow](#).

What is a General Rate Case (GRC)?

General rate cases (GRCs) are proceedings used to address the costs of operating and maintaining the utility system and the allocation of those costs among customer classes. For California's three large investor-owned utilities (IOUs), the GRCs are parsed into two phases. Phase I of a GRC determines the total amount the utility is authorized to collect, while Phase II determines the share of the cost each customer class is responsible for and the rate schedules for each class. Each large electric utility files a GRC application every four years. For smaller utilities, authorized costs and allocation of costs are done in just one phase.

The CPUC reviews detailed cost data for various areas of utility operations and approves a budget for the first year – called a test year – of the GRC cycle. For years 2, 3, and 4 – called post-test years – the GRC decision prescribes how to adjust the test year budget for inflation and other factors that may affect costs, such as additional capital projects between test years. The Commission has put in place regulatory mechanisms to adjust the costs approved in GRCs for unforeseen circumstances. For example, the Catastrophic Event Memorandum Account allows utilities to record costs for state emergencies declared by the governor.

Watch our [video on YouTube](#) that explains what a GRC is and why it's important to consumers.

Click on the links below for more information about each utility's GRC cycle.

[Pacific Gas & Electric \(PG&E\)](#)

[Southern California Edison \(SCE\)](#)

[San Diego Gas & Electric \(SDG&E\)](#)

Bear Valley Electric Services (a subsidiary of the Golden State Water Company)

Liberty (CalPeco)

PacifiCorp

My Conclusions:

Solar and backup batteries are needed by the Nevada Electric Grid to protect Homeowners and small businesses. NV ENERGY needs to adopt an all-in Residential Solar Policy.

Nevada Electrical Grid Planning will not help the Nevada Business Community unless Planning becomes a large tent to bring all under. Working with Warren Buffett on the planning committee can build a positive relationship.

Henderson, Nevada, can back up all the Phoenix Fabs by Quality Processing of Sulfuric Acid and Water to be pure for the processing of 2NM chips. The Freeway from Las Vegas to Phoenix will make the logistics less expensive for the Fabs to use Nevada Business.

Knowing the exact loads of each of the Data Centers in Nevada will make Energy Planning a science instead of a guess. Here is the video to explain the Data Center loads and Water usage for the 1240 data centers in the USA in 2024. <https://www.youtube.com/watch?v=t-8TDOFgkQA>

Warren Buffett knows about \$17 million Doug Cannon, the former President and CEO of NV Energy, approved. It would be prudent to speak with Warren and let him know the State needs him on the Planning Commission.

Opening communication with Bill Gates will help the Planning Commission to do a better job of understanding when the Fusion-Liquid Salt Reactors are coming online.

A smart Grid will reduce outage time and allow for a control center for the entire Nevada Grid. All three phases will return and prevent damage to three-phase motors and pumps.

We will need our State to be informed about any county tax giveaways for Data Centers before, not after.

I recommend that the State of Nevada add to the Utility Grid Committee the University of Nevada Engineering Department and the Physics Department of the University of Utah. I have worked for the University of Utah Physics Department and can provide the introduction.

There are good Structural Engineering Companies in Reno that I have worked with and respect their ability.

Training the Electrical Workforce is paramount to the success of the Nevada Electric Grid. I recommend the Vocational School in Sun Valley and Truckee Meadow Community College to be included in the Electric Grid committee to communicate the skills needed and how to certify the workforce. If we provide a certified Nevada Vocational Diploma, we stand a better chance of attracting the Technical Workforce.

Seventy-four pages are a long read, and I hope you all will take the time to understand the ramifications for our State Electric Grid and do your best to protect Residential Solar with Battery storage.

I am available on Zoom or Teams to discuss any of the above.

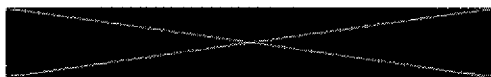
Respectfully submitted to the Nevada Public Utility Commission,

Have a good day.



www.Gogreenlocally.org

My EMAIL:



Trisha Osborne

From: ALAN NICHOLS <anichols6330@gmail.com>
Sent: Monday, September 15, 2025 9:18 PM
To: Trisha Osborne
Cc: BPA
Subject: Re: Public Utilities Commission of Nevada Agenda 16-25-Continued
Attachments: NEVADA ENERGY PROFILE 2025 A Nichols 9 15 2025.pdf

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello Trisha, Anna, and Kellie,
Thank you all for your help.
I have made the enclosed PDF to explain the value of Residential Solar and Battery Systems for our state.
I was surprised by the amount.
My flight to SF is on Wednesday, and I will be back on Sunday.
I can respond to emails.

Have a good day.
Alan Nichols

ALAN NICHOLS
Phone: 1-775-502-6811
www.Gogreenlocally.org
My EMAIL: ANICHOLS6330@GMAIL.COM
Member of the Million Veteran Program

On Mon, Sep 15, 2025 at 10:35 AM Trisha Osborne <trosborne@puc.nv.gov> wrote:

Dear Alan Nichols,

The attached has been received for Agenda 16-25.

Thank you,

Trisha Osborne

Assistant Commission Secretary

Public Utilities Commission of Nevada

1150 E. William Street

Carson City, NV 89701-3109

P: 775-684-6112

F: 775-684-6110

trosborne@puc.nv.gov

puc.nv.gov

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From: Anna F. Miller <afmiller@puc.nv.gov>

Sent: Monday, September 15, 2025 8:43 AM

To: BPA <BPA@puc.nv.gov>

Subject: FW: Public Utilities Commission of Nevada Agenda 16-25-Continued

Forwarding to BPS.

Thank you.

Anna Miller

Administrative Assistant III



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From: ALAN NICHOLS <anichols6330@gmail.com>

Sent: Sunday, September 14, 2025 3:02 PM

To: Anna F. Miller <afmiller@puc.nv.gov>

Subject: Re: Public Utilities Commission of Nevada Agenda 16-25-Continued

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello Anna,

Thank you for the link to send my paper.

I will send the PDF today. If there is a problem with the file size, I can send it via FTP instead.

Have a good day.

Alan Nichols

ALAN NICHOLS

Phone: 1-775-502-6811

www.Gogreenlocally.org

My EMAIL: ANICHOLS6330@GMAIL.COM

On Fri, Sep 12, 2025 at 12:59 PM Anna F. Miller <afmiller@puc.nv.gov> wrote:

You are on a service list maintained by the Commission. Please find attached additional supporting material for this agenda. Subsequent emails will be sent as additional supporting materials become available.

If you have any questions or are receiving this email in error, please call the Public Utilities Commission at (775) 684-6101.

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Anna Miller, Administrative Assistant III

Public Utilities Commission of Nevada

1150 E. William Street, Carson City, NV 89701-3109

P: 775-684-6101 F: 775-684-6110

puc.nv.gov | afmiller@puc.nv.gov



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NEVADA ENERGY PROFILE 2025

- The majority of 67,650 solar installations in Nevada are residential solar power installations. Besides these, Nevada has invested a significant amount of money into large-scale solar farms capable of supplying renewable electricity to tens of thousands of homes.
- $\$20,000.00 \times 67,500 = \$1,353,000,000.00$ Residential Solar investment in the State of Nevada

What is the average solar energy consumption in Nevada?

- NV energy consumption for an average household is around 1,000 kilowatt-hour a month, so this should be your starting point in understanding your energy needs and the solar system size you need. NV offers several Solar Energy Systems Incentive Programs. Nevada's strongest solar incentives program is its strong net metering policy.
- $1,000 \text{ kWh/Month} \times 67,650 = 67,650,000 \text{ kWh / Month}$ Solar generated in the State of Nevada, and stored in Batteries for use at night or the next morning.

Nevada State Energy Profile

Nevada Quick Facts

- Nevada consumes over 11 times more energy than the state produces, in part because Nevada produces only small amounts of natural gas and crude oil and does not mine any coal.
- Most of Nevada's largest power plants by capacity and generation are natural gas-fired. In 2024, natural gas fueled 53% of Nevada's total in-state electricity generation, its smallest share in the past 19 years.
- In 2024, Nevada ranked fourth in the nation in total electricity generation from utility- and small-scale solar resources combined. Solar provided 31% of the state's total generation.
- Hoover Dam, one of the nation's largest federal hydroelectric facilities, is on Nevada's border with Arizona. It supplied about 3% of Nevada's total in-state generation in 2024.
- In 2024, Nevada accounted for 25% of the nation's utility-scale electricity generation from geothermal energy. Only California generated more.

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- <https://www.eia.gov/state/print.php?sid=nv#tabs-1>

Electricity

Nevada's largest power plant by capacity and generation is natural gas-fired and recycles three-fourths of the water it uses.

Natural gas fuels the largest share of Nevada's electricity generation, and 8 of the state's 10 largest power plants by capacity and 7 of the 10 largest by generation are natural gas-fired.⁴² In 2024, natural gas fueled 53% of Nevada's total in-state electricity generation from both utility-scale (greater than 1 megawatt capacity) power plants and small-scale (less than 1 megawatt capacity) generating systems—the smallest share since 2005.⁴³ Because Nevada is the driest state in the nation, minimizing the use of scarce water is a priority.⁴⁴ The state's largest generating plant, the 1,100-megawatt Chuck Lenzie Generating Station near Las Vegas, uses high-efficiency natural gas combined-cycle technology and recycles three-fourths of the water it uses. The facility also reduces water use with a dry-cooling

system that allows the combined-cycle plant to use only 7% as much water as an equivalent conventional water-cooled power plant.⁴⁵

In 2024, renewable energy resources accounted for 43% of Nevada's total in-state electricity net generation. Utility-scale solar and small-scale solar photovoltaic (PV) together supplied about 31% of the state's total generation, while geothermal energy provided 8% and hydroelectric power 3%.⁴⁶ Hoover Dam, one of the nation's largest hydroelectric dams, is on Nevada's border with Arizona and has power plants in both states. It accounted for 95% of Nevada's hydroelectric power generation in 2024.^{47,48,49,50} Wind and biomass provided the rest of Nevada's renewable generation.⁵¹

Coal fueled about 5% of Nevada's total electricity generation in 2024, down from more than 52% two decades earlier.⁵² Two coal-fired power plants in the state were retired in 2012, and the two remaining coal-fired power plants are scheduled to be converted to natural gas by 2026.^{53,54} One of these coal-fired power plants is an industrial facility—TS Power Plant—owned by Nevada Gold Mines (NGM). It began operating in 2008 and provides electricity to gold and copper mining operations in the desert near Elko. The plant sells its excess generation to the regional electricity transmission company.⁵⁵ NGM announced in 2022 that it would be converting the plant to natural gas and developing a 200-megawatt solar facility with battery energy storage on the same site, which was completed in 2024.^{56,57} Similarly, NV Energy completed in 2024 the conversion of a coal-fired power plant to a grid-scale battery energy storage system.⁵⁸

In 2024, total electricity consumption in Nevada was about evenly distributed among the state's residential, industrial, and commercial sectors. Nevada's average electricity price was less than in almost three-tenths of the states.^{59,60} The residential sector, where more than one in three households use electricity for home heating and most use air conditioning, accounted for nearly two-fifths of the state's electricity consumption.^{61,62} The commercial sector, including the famously bright lights on the Las Vegas Strip, used about one-third, and the industrial sector consumed about one-third. Nevada's transportation sector, which consists of light rail, accounted for a small amount of the state's electricity consumption.^{63,64} Nevada continues to add electric vehicle (EV) charging stations to its highway infrastructure, as a member of the Regional Electric Vehicle Plan for the West.⁶⁵ As of early 2025, Nevada had 615 public EV charging locations.⁶⁶ Nevada ranks in the top 20 states with over 45,000 registered battery EVs.⁶⁷

Nevada's in-state electricity generation typically exceeds consumption, and supplies are exported to other states over high-voltage transmission lines.⁶⁸ Before 2014, two separate transmission grids provided power to Nevada. The one in the southern part of the state supplied the Las Vegas area, and the one in the northern part of the state supplied many communities, including the Elko and Reno areas. In 2014, the One Nevada transmission project, which runs the length of the state in eastern Nevada, connected the two grids. Two new transmission lines, part of the Greenlink Nevada initiative, could connect to the One Nevada transmission line and run along the north and west of Nevada.^{69,70,71} The Greenlink West Transmission Project was formally approved by the Bureau of Land Management in September 2024, while the Greenlink North Transmission Project still awaits approval as of April 2025.^{72,73} Another large-scale transmission project in development would cross through Nevada, allowing delivery of power generated from renewable resources in Wyoming to market centers in California, Arizona, and Nevada.⁷⁴

Renewable energy

Since 2016, the share of Nevada's in-state electricity generation from all solar sources has more than tripled.

In 2024, renewable energy sources provided 43% of Nevada's total electricity generation from both utility- and small-scale facilities. Utility-scale solar PV facilities generated more electricity than the state's hydroelectric plants for the first time in 2016, and more power than geothermal energy for the first time in 2017. Since 2016, the share of Nevada's in-state electricity generation from all solar sources has more than tripled. In 2024, utility-scale and small-scale solar power—including from solar thermal power plants—provided 71% of Nevada's in-state generation from all renewable sources and 31% of the state's total electricity generation.⁷⁵ Nevada leads the nation in solar power potential and ranks sixth in the nation in total solar capacity and fifth in solar generation.^{76,77,78}

Nevada is one of seven states with utility-scale electricity generation from geothermal energy, and the state is second to California in geothermal-sourced power production.⁷⁹ Geothermal resources account for one-fifth of Nevada's generation from all renewable sources and about 8% of the state's total electricity generation.⁸⁰ Among the state's electricity-generating facilities is a first-of-its-kind hybrid geothermal-solar power plant, which combines geothermal power with solar PV and solar thermal generation. That facility began as a geothermal power plant in 2009, and PV

panels were added later, creating a baseload geothermal facility with peaking solar generation in daytime, when air conditioning demand is greatest. In 2015, the facility added a solar thermal power plant, which raises the temperature of the geothermal fluids and increases the efficiency and amount of generation from the geothermal power plant.⁸¹ Nevada's available open land and favorable tax incentives have driven data centers to open in the state, which are then able to tap into geothermal energy resources to keep up with the new power demand.⁸²⁻⁸³

Almost all of the rest of Nevada's renewable generation comes from its hydroelectric power plants, primarily the Hoover Dam, the state's third-largest power plant by capacity and eighth largest by generation in 2023.⁸⁴⁻⁸⁵ Built in less than five years during the Great Depression, Hoover Dam has a generating capacity of about 2,080 megawatts, half of which is in Nevada and half is in Arizona. The U.S. Bureau of Reclamation operates the dam, which supplies electricity to Nevada, Arizona, and California. Hoover Dam is a National Historic Landmark.⁸⁶⁻⁸⁷⁻⁸⁸ After reaching historically low generation levels in 2023 because of drought conditions in the Western states, hydroelectricity increased by 22% in 2024 to approach levels near 2022 once again.⁸⁹⁻⁹⁰

Nevada's wind resource potential is on scattered mountain ridges across the state.⁹¹ Because the federal government owns and manages 80% of the state's land, most utility-scale wind projects need federal approval.⁹²⁻⁹³ Nevada's first utility-scale commercial wind farm opened in 2012. The 150-megawatt wind farm remains the only utility-scale wind project operating in the state, with no new utility-scale wind projects in development as of March 2025.⁹⁴

Nevada first enacted a Renewable Portfolio Standard (RPS) in 1997 and has modified it several times since, most recently in 2019. It now requires that at least 50% of the electricity that utilities sell to Nevada customers must be generated from renewable sources by 2030.⁹⁵⁻⁹⁶

Petroleum

Nevada does not have any significant crude oil reserves and has only a modest amount of production.⁹⁷⁻⁹⁸ Petroleum exploration in the state was sporadic during the past century.⁹⁹ Nevada's crude oil production reached a high of more than 4 million barrels per year in 1990, but annual production declined after that. In 2024, the state produced less than 140,000 barrels.¹⁰⁰ Nevada has one crude oil refinery, which can process about 2,000 barrels of crude oil per calendar day and produces only asphalt and road oil.¹⁰¹⁻¹⁰² The state gets additional petroleum products from out of state. Las Vegas receives refined petroleum products like motor gasoline and diesel fuel by pipeline from refineries in Utah and Southern California, and the Reno area receives petroleum products from refineries in Northern California.¹⁰³⁻¹⁰⁴ In 2023, Nevada had the sixth-highest average motor gasoline price in the nation.¹⁰⁵

Nevada's transportation sector consumes most of the petroleum products used in the state. In 2023, about 87% of the petroleum consumed in Nevada went to that sector.¹⁰⁶ Federal regulations require that both the Las Vegas and the Reno metropolitan areas use oxygenated motor gasoline during the winter months. Additionally, motor gasoline sold during the summer in Washoe County, including the Reno area, is a reduced volatility blend that lowers the emissions that contribute to the formation of ground-level ozone.¹⁰⁷⁻¹⁰⁸ Ethanol is used as an oxygenate for motor gasoline, but there are no fuel ethanol plants in Nevada.¹⁰⁹⁻¹¹⁰ Ethanol is shipped into the state by rail and blended with motor gasoline at Nevada's petroleum product terminals.¹¹¹⁻¹¹² The industrial sector accounts for about 9% of Nevada's petroleum consumption. The commercial sector uses about 3% and the residential sector, where about 3 in 100 Nevada households use petroleum products, mostly propane, for home heating, accounts for almost all the rest. A small amount of petroleum is used for power generation.¹¹³⁻¹¹⁴ On a per capita basis, Nevada uses less petroleum than about three-fifths of the states.¹¹⁵

Natural gas

Nevada has no significant natural gas reserves and only a minimal amount of natural gas production.¹¹⁶ Almost all of that production is a byproduct of oil wells and is used to operate equipment in the fields where it is produced.¹¹⁷⁻¹¹⁸⁻¹¹⁹ Interstate pipelines provide the vast majority of Nevada's natural gas supply. Most of the natural gas that enters Nevada comes through Utah, with smaller amounts from California and Idaho. Nevada consumers use slightly less than three-tenths of the natural gas that enters the state. The rest continues, with about three-quarters going to California and one-quarter to Oregon.¹²⁰ The electric power sector uses 64% of the natural gas delivered to Nevada consumers. The residential sector, where nearly three in five households use natural gas as their primary home heating fuel, consumes 18% of the state's natural gas deliveries. The commercial sector uses about 12% of the natural gas delivered to Nevada consumers, and the industrial sector accounts for 7%. The transportation sector uses a small amount of compressed natural gas vehicle fuel.¹²¹⁻¹²²

Coal

Nevada has no commercial coal deposits or coal mines.¹²³ However, the state's two coal-fired power plants, one operated by a utility and the other an industrial facility that generates power for its own use, are both located in northern Nevada.^{124,125} These two coal facilities are among the 10 largest power plants by generation in the state and consumed 1.5 million tons of coal in 2023.^{126,127} The North Valmy Generating Station, Nevada's only remaining utility-owned coal-fired power plant, receives coal shipped by rail from Wyoming, Colorado, and Montana. The TS Power Plant, Nevada's only remaining industrial coal-fired power plant, receives coal shipped by truck from Utah and Colorado and by rail from Colorado.^{128,129} Nevada's 2024 coal consumption was less than one-fifth the amount used in the state in 2001.¹³⁰

Energy on tribal lands

Nevada has 19 federally recognized tribes and is home to nearly 44,000 Native Americans.^{131,132} The state has a total of 28 reservations, bands, colonies, and community councils.¹³³ The largest of the state's reservations, Pyramid Lake Paiute Tribe's Reservation, covers almost a half-million acres, but most of Nevada's reservations are small. Combined, the state's tribal areas cover about 1.4 million acres in total, which is less than 2% of the state's land area.^{134,135,136}

The 250-megawatt Moapa Southern Paiute Solar Project is the first large-scale solar power plant built on tribal land.

Tribal lands, like most of Nevada, have abundant solar resources, and the state's tribes have begun to develop solar generation on their lands.^{137,138} Nevada's Moapa River Indian Reservation is the site of the nation's first utility-scale solar power plant built on tribal land. The 250-megawatt Moapa Southern Paiute Solar Project—located about 30 miles northeast of Las Vegas on land leased from the Moapa Tribe—became fully operational in 2017. The project's solar power is sold to the Los Angeles Department of Water and Power, and the Moapa Band of Paiutes receives revenue from the project.¹³⁹ Two additional large solar projects came online on the reservation in 2023—the 300-megawatt Eagle Shadow Mountain project and the 200-megawatt Arrow Canyon Solar Project.^{140,141} Other Nevada tribes have also built solar projects on their reservations.¹⁴² The Washoe Tribe of Nevada and California installed seven ground-mounted small-scale solar PV projects at community buildings on tribal land.¹⁴³ The Yerington Paiute Tribe created an energy plan and has installed solar panels as it works toward a goal of energy self-sufficiency. Ground-mounted solar panels provide power to several buildings as well as to well pumps used for irrigation and at a water treatment plant on the reservation.^{144,145}

Geothermal energy potential also exists on Nevada's tribal lands. The Pyramid Lake Paiute Tribe's reservation near Reno and the Walker River reservation are ranked among the top five reservations in the nation with the greatest potential for geothermal-sourced electricity generation.¹⁴⁶ The Pyramid Lake tribe investigated their reservation's geothermal resource potential. Although the reservation is in an area where other non-tribal geothermal power plants are located, the reservation's geothermal resources have not been developed, and there are no geothermal projects on Nevada's tribal lands.^{147,148,149}

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- ¹²⁹ U.S. EIA, Annual Coal Distribution Report (October 30, 2024), Domestic distribution of U.S. coal by: Destination State, consumer, destination, and method of transportation, Nevada, Table DS-24, Domestic Coal Distribution, by Destination State, 2023.
- ¹³⁰ U.S. EIA, Coal Data Browser, Total Consumption, Nevada, Annual, 2001-24.
- ¹³¹ U.S. Department of the Interior, Bureau of Indian Affairs, "Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs," Federal Register, Vol. 89, No.5, Monday, January 8, 2024, Notices, p. 944-947.
- ¹³² U.S. Census Bureau, 2023 American Community Survey, B02001 Race, Nevada.
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- ¹³⁴ Pyramid Lake Paiute Tribe, About Us, accessed May 5, 2025.
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- ¹³⁸ Cates, Karl and Dennis Wamsted, "Tribal Utility-Scale Solar Initiatives Advance Across Southwest U.S.," Institute for Energy Economics and Financial Analysis (October 2019).
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- ¹⁴³ U.S. Department of Energy, Office of Indian Energy Policy and Programs, Project Reports for Washoe Tribe of Nevada and California, 2015 Project, Washoe Tribe Clean Energy Project, Final Technical Report (March 18, 2016).
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- ¹⁴⁵ "Paiute Tribe to receive solar panel," Reno Gazette Journal (February 11, 2014).
- ¹⁴⁶ U.S. Department of Energy, Office of Indian Energy, Developing Clean Energy Projects on Tribal Lands, Data and Resources for Tribes, fiscal year 2013, p. 26.
- ¹⁴⁷ U.S. Department of Energy, Energy Efficiency and Renewable Energy, Geothermal Technologies Office 2013 Peer Review, Comprehensive Evaluation of the Geothermal Resource Potential within the Pyramid Lake Paiute Reservation (April 23, 2013).
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- ¹⁴⁹ U.S. EIA, Nevada Profile Overview, Interactive Map, Layer List: Indian Lands, Geothermal Power Plants, accessed May 5, 2025.

Other Resources

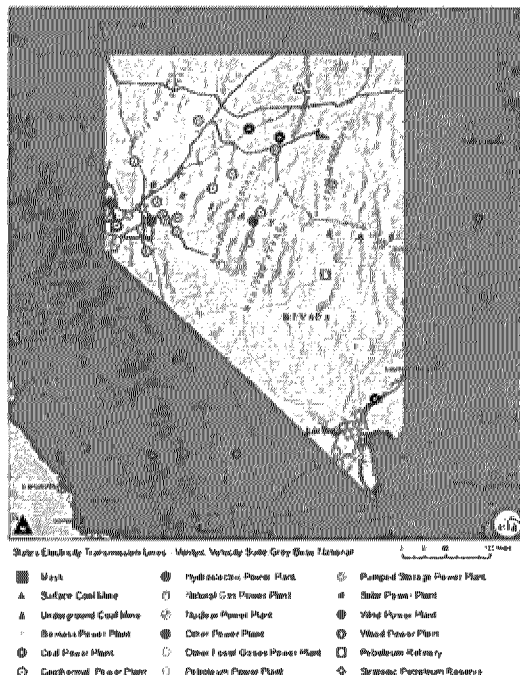
Energy-Related Regions and Organizations

- [Petroleum Administration for Defense District \(PADD\): 5](#)
- [North American Electric Reliability Corporation \(NERC\) ERO Enterprise: Regional Entities: Western Electricity Coordinating Council \(WECC\)](#)

Other Websites

- [Nevada Governor's Office of Energy](#)
- [Nevada Public Utilities Commission](#)
- [Nevada Department of Business and Industry, Housing Division, Weatherization Assistance Program](#)
- [Nevada Department of Health and Human Services, Division of Welfare and Supportive Services, Energy Assistance](#)
- [Nevada Division of Environmental Protection](#)
- [Nevada Rural Electric Association](#)
- [Nevada Division of Minerals & the Commission on Mineral Resources](#)

- [Nevada Division of Minerals Open Data Site](#)
- [EIA Nevada Flickr Album](#)
- [Southern Nevada Fleet Association](#)
- [Colorado River Commission of Nevada](#)
- [Western Regional Partnership \(WRP\)](#)
- [Alternative Fuels Data Center, Federal and State Laws and Incentives](#)
- [USA.Gov, Get help with energy bills](#)
- [NC Clean Energy Technology Center, Database of State Incentives for Renewables and Efficiency \(DSIRE\)](#)
- [National Association of Regulatory Utility Commissioners \(NARUC\)](#)
- [National Association of State Energy Officials \(NASEO\)](#)
- [National Conference of State Legislatures \(NCSL\), Energy](#)
- [National Renewable Energy Laboratory \(NREL\), Geospatial Data Science, Data and Tools](#)
- [U.S. Geological Survey \(USGS\), Publications](#)
- [Interstate Oil and Gas Compact Commission \(IOGCC\)](#)
- [Western Interstate Energy Board \(WIEB\)](#)
- [Western Area Power Administration \(WAPA\)](#)
- [Bonneville Power Administration \(BPA\)](#)
- [U.S. Department of Health & Human Services, Office of Community Services, An Office of the Administration for Children & Families, Low Income Home Energy Assistance Program \(LIHEAP\)](#)
- [U.S. Department of Energy, Office of Indian Energy Policy and Programs](#)
- [U.S. Geological Survey \(USGS\), Maps](#)
- [Lawrence Livermore National Laboratory \(LLNL\), Energy Flow Charts](#)
- [National Renewable Energy Laboratory \(NREL\), SLOPE: State and Local Planning for Energy](#)
- [National Renewable Energy Laboratory \(NREL\), Tribal Energy Atlas](#)
- [EIA Natural Gas Storage Dashboard](#)
- [Bureau of Land Management \(BLM\), Renewable Energy](#)
- [Great Basin Center for Geothermal Energy](#)
- [EIA Energy Disruptions Maps](#)
- [U.S. Department of Agriculture \(USDA\), Rural Development Energy Programs](#)



Who Really Controls U.S. Electricity Prices?

By Robert Rapier,

Senior Contributor.

Robert Rapier is a chemical engineer covering the energy sector.

Follow Author

Sep 12, 2025, 06:00 am EDT Sep 12, 2025, 10:15 am EDT



When we see prices rise and fall at the gas pump, we generally have an idea of what is driving the changes. Typically, it's movements in the underlying price of oil, or sometimes there are refinery issues that can impact gasoline prices even when oil prices are stable. And people generally blame the oil companies in any case.

The electricity markets are far more opaque. Electricity bills have skyrocketed in many places this summer, but the reasons you hear depend on who you ask.

Politicians blame climate mandates, utilities point to infrastructure upgrades, and analysts cite natural gas volatility. The truth is far messier and more complex than the gasoline supply chain. Prices are shaped by a chain of fuel suppliers, generators, grid operators, regulators, and investors—each adding its own costs, incentives, and risks.

In a system built to be competitive and transparent, the big question is: who really controls U.S. electricity prices?

The Multi-Layered Pricing Machine

The truth is that electricity prices aren't set by a single authority. They're the outcome of a chain of events where costs move through several hands before reaching your monthly bill.

Fuel Providers – The Invisible Hand

Natural gas, coal, uranium, and renewables set the baseline cost for generation. When gas prices spike—because of weather, geopolitics, or export demand—power prices usually follow. Even in renewables-heavy regions, gas often sets the marginal price that clears the market.

Power Generators – The Bidmakers

Independent power producers (IPPs) and utility-owned plants bid into wholesale markets. Their bids factor in fuel, maintenance, and desired return. In competitive regions, generators live or die by market pricing. However, that has been a very lucrative market for many competitive producers in recent years. In regulated states, cost-plus pricing still shields many plants from direct market swings.

Grid Operators – The Market Architects

Regional transmission organizations (RTOs) like PJM, ERCOT, and CAISO run day-ahead and real-time markets. They dispatch the lowest-cost power first, manage congestion, and maintain reliability. Their locational marginal pricing algorithms can make prices jump dramatically when demand peaks or transmission lines are constrained.

Utilities – The Delivery Layer

Utilities buy power at wholesale and deliver it to homes and businesses. In regulated states, they recover costs through rate cases filed with state commissions. In deregulated markets, they act more like brokers, passing through market prices with limited markup.

Regulators – The Gatekeepers

State public utility commissions approve rates, capital recovery plans, and allowable returns. They can slow down hikes but rarely block them outright if tied to fuel or infrastructure costs. At the federal level, the Federal Energy Regulatory Commission (FERC) oversees interstate transmission and wholesale rules.

Investors – The Hidden Influencers

Shareholders expect steady dividends and predictable returns. Their pressure shapes capital allocation, rate design, and project choices—often tilting utilities toward capital-intensive projects that guarantee recovery, even when cheaper solutions exist.

Why Prices Swing

Electricity prices are notorious for volatility, and the drivers go well beyond seasonal demand.

Fuel Costs

Natural gas still sets the marginal price in most U.S. markets. A cold snap in New England or a Texas heat wave can send prices skyrocketing within hours.

Weather

Climate extremes now push the grid to its limits more often. In markets like ERCOT, scarcity pricing mechanisms can trigger massive spikes even during short supply shortages.

Infrastructure Bottlenecks

Transmission congestion and limited interregional connectivity isolate some markets. Congestion pricing can push local prices higher even when generation is plentiful elsewhere.

Policy Design

Capacity markets, carbon pricing, and renewable mandates all affect how generators bid and how utilities recover costs. Policies intended to accelerate decarbonization can raise near-term costs before long-term savings materialize.

Market Structure

Vertically integrated utilities offer more stable prices but lack competition. Retail choice markets deliver competition—but they also expose consumers to wholesale swings, often without effective hedging tools.

Together, these factors create a pricing system that is reactive, fragmented, and hard to predict. For investors, understanding these drivers is crucial—not just for picking utility stocks but for anticipating regulatory and infrastructure shifts.

Case Studies in Price Formation

Electricity markets reveal their true character under stress. These three regions show how market design and fuel dependency create very different outcomes.

Texas (ERCOT): Scarcity Pricing Meets Deregulation.

Winter Storm Uri in 2021 exposed ERCOT's vulnerabilities. With minimal interconnections to other states and no capacity market, ERCOT relied on scarcity pricing to keep generation online. Wholesale prices spiked to \$9,000/MWh, bankrupting dozens of retail providers and leaving consumers with retroactive charges. Investors in flexible generation assets reaped windfall profits. Lawmakers have since proposed reforms, but the fundamental trade-off between market freedom and reliability remains.

California (CAISO): Renewables, Wildfires, and Risk Premiums.

California's aggressive renewable buildout creates unique pricing dynamics. Midday solar surpluses often push wholesale prices negative, only for prices to jump during the evening ramp. Add wildfire liabilities—PG&E's 2019 bankruptcy is the prime example—and the result is some of the highest retail rates in the nation. Demand-response programs and time-of-use rates aim to smooth peaks, but volatility persists. Investors see innovation upside here but must accept higher regulatory and climate risk.

New England (ISO-NE): Pipeline Constraints and Winter Spikes.

Despite progressive energy policies, New England remains highly dependent on natural gas in winter. Limited pipeline capacity forces the region to import LNG at global prices, which can spike during cold snaps. ISO-NE's capacity market offers some buffer, but price shocks still happen. In January 2022, wholesale prices briefly topped \$200/MWh despite adequate generation—showing that fuel logistics, not generation capacity, can be the binding constraint.

Winners and Losers

Electricity pricing is not just about cost recovery; it's a transfer of value between stakeholders.

Utilities often come out ahead. In regulated states, they earn guaranteed returns on capital projects—whether that's transmission upgrades, grid hardening, or smart meters. In deregulated markets, they still collect delivery fees and benefit from infrastructure ownership.

Independent power producers can profit handsomely from volatility. Gas peakers, flexible generation, and increasingly battery storage assets capture premium prices when supply tightens.

Infrastructure investors—including pension funds and private equity—quietly collect rent from transmission lines, substations, and renewable portfolios. Their returns are often inflation-linked, paid for by ratepayers who may not realize where their money goes.

Consumers, meanwhile, bear the brunt of volatility. Households have little ability to hedge demand, leaving them vulnerable to fuel and policy shocks. Large industrials fare better, using on-site generation, demand response, and long-term contracts to manage exposure.

Policymakers must balance affordability, reliability, and decarbonization. When reforms backfire or infrastructure lags, they pay a political price.

In short, electricity pricing is less about electrons and more about allocation. Investors who position around rate-recoverable assets and volatility-friendly generation stand to gain. For everyone else, the forces setting prices are largely invisible—and often misaligned with household budgets.

The Illusion of Control

It's tempting to think electricity prices are simply the product of supply and demand, but the reality is far more choreographed. From fuel markets to regulators, the system is layered and opaque. Consumers think they are paying for power; in reality, they are funding infrastructure projects, policy goals, and investor returns.

For investors, the lesson is clear: the winners are those who understand the choreography—who spot assets with guaranteed cost recovery, anticipate regulatory pivots, and hedge against volatility. For everyone else, the price of power is a moving target.

Electricity prices aren't dictated. They're negotiated. And there are lots of parties at the table.

CONCLUSION:

The Residential Solar and Battery Storage contribution to the Residents and Small Business Owners is over \$1 billion per Month.

67,650,000 kWh / Month Residential Solar generated in the State of Nevada, and stored in Batteries for use at night or the next morning.

Solar Battery Storage powers Handicapped and Veterans homes when the lights go out. The outages from 2016 to 2025 have increased from several seconds to over ten hours. If you were on Residential Oxygen, would you want to be without it for ten hours?

Residential Solar System owners have 20 20-year (ROI) Return on Investment. If NV Energy rates eliminate Net-Metering, the utility will add \$1.3 billion to its profits. NV Energy is taking our money spent on peak demand usage reduction and pocketing a valuable resource for free. Robbery? What else is it called?

I wrote software at university in the 1970s and tested Parallel computing AI. The hardware was capable then of only serial data, which has not changed. I know of only one Algorithm that works for chemical structure.

Microsoft is storing Users' Photos, Word, Excel, and PowerPoint documents in its data centers. Has anyone seen other storage file structures? ChatGPT?

What is needed for Data Centers is fiber connections close to Urban areas. The reality of AI is not what is hyped.

The State of Nevada needs a thriving Residential and Small Business Solar-Battery structure on the Electric Grid. Other states that have massive economies are already all in for Residential and Small business Solar Battery systems.

Our State can increase business opportunities by providing the workforce and facilities to support the Fabs in Arizona. This helps our Casinos and Retail Business.

I do not see any negatives for Residential and Small Business Solar and Batteries.

Thank you for reading my document.

The Nevada Electric Grid Change from 2025 for Future Electrical Loads for Residential and Business Customers.

**Alan Nichols, September 2025 for Nevada Public Utilities
Commission NRS 241.029 September 16, 2025.**

I am available on Zoom or Teams to discuss any of the above.

Respectfully submitted to the Nevada Public Utility Commission,

Have a good day.

Alan Nichols

www.Gogreenlocally.org

My EMAIL: ANICHOLS6330@GMAIL.COM

Trisha Osborne

From: Steven Luce <seluce412933@yahoo.com>
Sent: Tuesday, September 16, 2025 9:06 AM
To: BPA
Subject: Today's Docket Number 25-02016

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good day,

I am opposed to this initiative that will allow NV Energy to increase electricity bills by \$50 per month for ALL working people across the state of Nevada.

Steven Luce
7221 Estonian Pl, Las Vegas, NV 89113
619-838-9985

Trisha Osborne

From: Keia Lavine <edenlavine@gmail.com>
Sent: Tuesday, September 16, 2025 9:13 AM
To: BPA
Subject: Reject the rates

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Commissioners, I, Keia Lavine, a Clark County resident, parent and business owner, ask you to reject all rate increases.

Be Extraordinary,
Keia Lavine

Trisha Osborne

From: Leslee Lopez <lesleelopez@yahoo.com>
Sent: Tuesday, September 16, 2025 9:13 AM
To: BPA
Subject: NV Energy Vote

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern

Please reject any rate increases from NV Energy. I am a Nevadan, and NV Energy does not need rate increases. Sincerely
Leslee Lopez Henderson Nv Sent from my iPhone

Trisha Osborne

From: Delannie Wiggins [Transportation] <wiggid@nv.ccsd.net>
Sent: Tuesday, September 16, 2025 9:21 AM
To: BPA
Subject: how can

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

We can't afford another rate increase please denied all from NV Energy we still gotta live and take care of our family so please think about your family and grandchildren

Trisha Osborne

From: Elspeth Whitney <elspeth@unlv.nevada.edu>
Sent: Tuesday, September 16, 2025 9:35 AM
To: BPA
Subject: Nv energy rate increases

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Sent from my iPhone

Please vote no. Nv energy has been increasing rates while making it difficult to do rooftop solar.

Elspeth Whitney

25 cottonwood

Blue Diamond NV 89004

Trisha Osborne

From: Dora Uchel <dorauchel@icloud.com>
Sent: Tuesday, September 16, 2025 9:37 AM
To: BPA
Subject: Please reject increase rate from the utility company

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please discard any Siri errors. I am dictating this as I provide childcare for one of my granddaughter. Good morning commissioners thank you for being able to listen to your constituents. My name is Dora. I am a blind, proud grandma of four beautiful, brilliant grandchildren. I am here to ask you to please reject further increase on our utility bills. We can barely make ends meet month after month Thanksgiving is coming up and I'm not sure that we will be able to have a family gathering even with Christmas around the corner. It's been hard this year. We ask that you do right by family like mine and help us pay our bills by rejecting further increase on our utility bills. Thank you for taking the time to read my email and I hope it makes sense. I am a blind mom and I am trying my best to help my children by providing childcare for my grandchildren as you know, childcare services is more expensive than college tuition Thank you for your understanding. Make it a great week.

Watch your thoughts, because they become your words. Watch your words, for they become your actions. Watch your action, for it becomes your habit. Watch your habits, for they become your character. Watch your character, for it becomes your destiny.

Best,

Dora Uchel-Martinez (she/her)

(775)501-4653

Nevada Disability Peer Action Coalition Advocate

Trisha Osborne

From: Rory Kuykendall <rkuykendall@hotmail.com>
Sent: Tuesday, September 16, 2025 9:53 AM
To: BPA
Subject: Commissioners: Reject Rate Increases

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I am asking the commissioners to reject all rate increases from Nevada Energy!!

Enough is enough. Our bills are too high!

Rory Kuykendall
505 Starfire Place
Las Vegas, NV 89107

Get [Outlook for iOS](#)

Trisha Osborne

From: Christian <cloud775292@gmail.com>
Sent: Tuesday, September 16, 2025 10:18 AM
To: BPA
Subject: Rate increases

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please reject all right increases it would not be fair on the pocketbook of those who cannot afford it which is many of us the fact that envy energy has no competition and they have only been property for years as well as a scandal where they're true or not that they have been utilizing funds for their own entertainment why should the people bear that burden if anything they should pay a portion of the fuel costs that it takes to produce the energy on top of that the American citizens here in Las Vegas Nevada have not had a pay increase everything else is gone up except our pay that will further burden the pocketbook of Las Vegas citizens well please decline all the rates thank you.

ORAL PUBLIC COMMENT (≈3 minutes)

Good morning Commissioners. My name is Christian Salmon. I am a Nevada residential ratepayer and property owner. I oppose the Draft Order in Dockets 25-02016 and 25-03006.

First, the daily demand charge. A daily maximum-kW charge penalizes brief, non-coincident residential spikes that do not drive long-run capacity costs. The Order itself says this is **not** time-of-use, so customers cannot reasonably plan around it. Before mandating a paradigm shift, require a 12-month **shadow-billing pilot**, publish correlation between daily maxima and system planning peaks, and give customers per-day max-kW visibility **before** implementation. Without that, this proposal fails the “**just and reasonable**” standard in **NRS 704.100** and **NRS 704.110**. (Draft Order, Summary, pages 8–10.)

Second, 15-minute netting. The Order defers it for Nevada Power but adopts it for Sierra’s new NEM customers while acknowledging technical feasibility concerns. If gradualism justifies deferral for one utility, it justifies deferral for the other. Interval billing requires verified AMI accuracy, clear dispute procedures, and a transparent valuation of distributed generation. Please **rescind** interval netting for Sierra and open a valuation and technical docket, maintaining monthly netting until the record is complete. (Draft Order, Summary, pages 10–11; Rate Design sections VII.A and VII.B.)

Third, CWIP for Greenlink. CWIP is an exception to used-and-useful. The Draft allows **50 percent** CWIP while acknowledging that prior representations about the projects were “misleading or factually inaccurate.” That calls for more caution, not less. Either **deny** CWIP and use AFUDC until in-service, or materially **limit** it with milestones, quarterly reporting, and claw-backs for delays, cancellations, or imprudence. **NAC 704.9484(3)(b)** is discretionary. (Draft Order, section V.A, paragraphs 50–53.)

Fourth, affiliate charges. The Order identifies persistent documentation issues yet still allows **\$2.7 million** for recovery. Only costs that are itemized by FERC account, clearly tied to Nevada utility operations, non-duplicative, and supported by unredacted invoices should be recovered. Otherwise, they fail the evidentiary requirements in **NRS 703.191**, **NRS 703.196**, and the “just and reasonable” standard in **NRS 704.100** and **NRS 704.110**. (Draft Order, section V.B, paragraphs 72–78.)

Finally, please **condition** any jurisdictional approvals on timely FERC alignment so Nevada customers do not subsidize wholesale shortfalls. (Draft Order, section V.C, paragraphs 107–109.)

For these reasons, I respectfully ask you to: **reject** the demand charge; **rescind** 15-minute netting for Sierra pending a full valuation/technical record; **deny or strictly limit** CWIP with milestones and claw-backs; and **disallow** affiliate recoveries unless proven with auditable detail. That is how Nevada meets the statutory requirement for **just and reasonable** rates. Thank you.

Comments in 3 minutes
NRS 704.100 35
Subsec 1 - B

RCVD - PUCN - LV
2025 SEP 16 AM 10:43

WRITTEN PUBLIC COMMENT (Expanded)

RCVD - PUCN - LV
2025 SEP 16 AM10:43

Re: Docket Nos. 25-02016 (Nevada Power General Rate Case) and 25-03006 (Net Metering Rider-2025)

Submitted by: Christian Salmon, Nevada residential ratepayer and property owner

Date: September 16, 2025

Position: Opposed to the Draft Order in full

I. Introduction and Standing

I am a Nevada residential ratepayer and property owner. I oppose the Draft Order in Docket Nos. 25-02016 and 25-03006 because it (1) imposes a **daily demand charge** on residential and small-business customers without a competent evidentiary basis showing alignment with cost causation; (2) asserts authority for and **adopts 15-minute netting** for Sierra's future NEM customers without an adequate technical and valuation record; (3) approves inclusion of **Construction Work in Progress (CWIP)** for the Greenlink projects in rate base contrary to the used-and-useful principle and intergenerational equity; and (4) allows recovery of **affiliate/corporate overhead charges** without the transparent, auditable substantiation Nevada law requires.

II. Governing Law and Ratemaking Principles

1. **Just and Reasonable Standard.** Nevada Revised Statutes **NRS 704.100(1)** require that all charges demanded or received by a public utility must be **just and reasonable**. **NRS 704.110** authorizes the Commission to set rates after hearing and to ensure that rates are just and reasonable based on a competent evidentiary record.
2. **Burden of Proof and Procedure.** **NRS 703.191** and **NRS 703.196**, together with **NAC 703.2201 through NAC 703.2481**, require that proposals be supported by competent, auditable evidence and that material rate design changes be justified on the record.
3. **Used-and-Useful and Prudence.** Nevada ratemaking places plant in rate base when it is **used and useful** and costs are **prudently incurred**. CWIP is an **exception** and must be applied sparingly and with caution.
4. **CWIP Incentive Is Discretionary.** **NAC 704.9484(3)(b)** permits (but does not require) inclusion of CWIP for **critical facilities**; this discretion must be exercised only when the record justifies shifting construction-phase risks and carrying costs to captive customers.
5. **Rate Design Principles.** Fundamental principles include **cost causation** (customers pay costs they cause), **gradualism** (avoid undue bill shock; phase in structural changes only after robust pilots), and **non-discrimination** (treat similarly-situated customers alike unless the record shows a material difference).

III. Record Facts from the Draft Order

- **Daily demand charge** for all residential and small-business customers of Nevada Power, with an effective date of **April 2026**; the Order acknowledges this is **not** time-of-use pricing and includes monitoring/reporting after implementation. (Draft Order, section “Summary,” pages 8–10.)
- **15-minute netting**: The Draft Order **declines** 15-minute netting for Nevada Power in this case (citing gradualism in light of the new demand charge), but **adopts** 15-minute netting prospectively for **Sierra’s** new NEM customers while grandfathering existing customers under monthly netting; the Order also states the Commission has authority to implement 15-minute netting. (Draft Order, section “Summary,” pages 10–11; section VII.A and VII.B on Rate Design.)
- The Draft Order states that existing NEM rate design does not fully recover costs, citing approximately **\$50 million per year** of under-recovery being shifted to non-NEM customers. (Draft Order, section “Summary,” pages 9–10.)
- **CWIP**: The Commission allows **50 percent** of Greenlink CWIP into rate base and acknowledges that past representations by NV Energy’s former CEO to the Legislature and the Commission were “misleading or factually inaccurate.” (Draft Order, section V.A, Commission Discussion and Findings, paragraphs 50–53.)
- **Affiliate charges**: The Commission finds significant deficiencies in affiliate-charge support and oversight, yet includes **\$2.7 million** as sufficiently supported for recovery. (Draft Order, section V.B, Commission Discussion and Findings, paragraphs 72–78, particularly paragraph 76.)
- **FERC/OATT alignment**: The Draft Order directs action to address potential under-recovery from FERC OATT customers and contemplates a FERC filing to update ancillary-service rates. (Draft Order, section V.C, Commission Discussion and Findings, paragraphs 107–109.)

IV. Argument

A. Reject the Residential/Small-Business Daily Demand Charge

1. **Cost-Causation Mismatch.** Daily maximum-kW charges tend to punish brief, non-coincident household spikes (HVAC cycling, cooking, EV starts) that do not necessarily drive long-run capacity additions. The Draft Order confirms this is **not** a time-of-use rate (Draft Order, Summary, pages 8–10), eliminating a clear behavioral signal. Without proof that **daily** maxima align with **system coincident peaks** and long-run capacity cost drivers, this design fails the “just and reasonable” standard in **NRS 704.100** and **NRS 704.110**.
2. **No Robust Shadow Billing.** A paradigm shift of this magnitude should be preceded by a **12-month shadow-billing pilot** using AMI data across representative segments to quantify: correlation with system peaks; seasonal variance; volatility; and real-world controllability. Post-implementation monitoring (after April 2026) is not a substitute for

pre-implementation proof. The evidentiary obligations in **NRS 703.191**, **NRS 703.196**, and **NAC 703.2201–703.2481** are not satisfied by “try it and see.”

3. **Gradualism Applied Inconsistently.** The Draft Order invokes gradualism to defer 15-minute netting for Nevada Power, yet simultaneously imposes a sweeping **demand-charge** structure. **Gradualism** should apply to all major shifts; approving one untested structural change while deferring another is internally inconsistent.

Requested relief (Demand Charge):

— **Reject** the daily demand charge.

— Alternatively, require **shadow billing for 12 months** before any go-live; publish correlation studies between daily maxima and system planning peaks; provide customers per-day max-kW visibility and tools **before** implementation; and adopt a **no-harm backstop** that automatically suspends the tariff if defined volatility thresholds are exceeded.

B. Do Not Adopt 15-Minute Netting for Sierra or Any Utility on This Record

1. **Authority vs. Prudence.** Even if the Commission possesses authority to adopt 15-minute netting (Draft Order, section VII.A), the prudential question is whether the record supports interval netting **now**. The Draft Order itself cites **technical feasibility** concerns and uses **gradualism** to defer the same concept for Nevada Power (Draft Order, Summary, pages 10–11). The same concerns apply to Sierra.
2. **AMI Integrity and Dispute Resolution.** Interval billing depends on accurate 15-minute AMI data, data validation, and a defined dispute process with measurable error rates. Those elements should be proven in a **pilot** and reported formally before any permanent tariff changes.
3. **Transparent DG Valuation.** The Draft Order asserts substantial under-recovery attributed to NEM. The appropriate remedy is a comprehensive **distributed-generation valuation proceeding** (energy, losses, capacity contribution at peak, avoided T&D, resiliency, compliance risk), not a partial shift to interval netting for one utility while deferring it for another.

Requested relief (Netting):

— **Rescind** adoption of 15-minute netting for Sierra at this time.

— Open a **valuation and technical docket**; maintain **monthly netting** pending a complete record.

C. Deny (or Further Limit) CWIP in Rate Base for Greenlink

1. **Used-and-Useful Is the Rule; CWIP Is the Exception.** The Draft Order allows **50 percent** CWIP (Draft Order, section V.A, paragraphs 50–53) while acknowledging that prior project representations were “misleading or factually inaccurate.” That background demands **greater caution**, not less. **NAC 704.9484(3)(b)** is discretionary. On this record, shifting construction-stage risk to ratepayers is not justified under **NRS 704.100** and **NRS 704.110**.
2. **Intergenerational Equity.** Customers can be billed during construction but may not be customers when assets become useful; later customers may benefit without paying

construction carrying costs. The Draft Order itself recognizes these concerns (Draft Order, section V.A, paragraph 51). The traditional AFUDC approach until in-service is the appropriate default.

Requested relief (CWIP):

— **Deny** CWIP inclusion and require AFUDC until facilities are used and useful; or
— If any CWIP remains, materially **reduce** the percentage (no more than 25 percent), impose **hard milestones**, require **quarterly schedule/budget reports**, and adopt **claw-backs** for cancelled, delayed, or imprudent segments.

D. Disallow Affiliate/Corporate Overhead Recoveries Absent Auditable Proof

The Draft Order describes persistent deficiencies with affiliate charges yet allows **\$2.7 million** for recovery (Draft Order, section V.B, paragraphs 72–78, especially paragraph 76). Only costs that are (a) itemized with **FERC account**, (b) **clearly tied** to Nevada-jurisdiction utility operations, (c) **non-duplicative**, and (d) supported by **unredacted invoices and attestations** should be recoverable. This is required by **NRS 703.191, NRS 703.196, NAC 703.2201–703.2481, NRS 704.100, and NRS 704.110.**

Requested relief (Affiliate Charges):

— **Disallow** recovery unless and until the utility proves each charge satisfies the four criteria above;
— Require a **standardized affiliate-cost schedule** in future GRCs;
— Reserve **administrative penalties** in subsequent cases if unsupported affiliate charges are proposed again.

E. Protect Jurisdictional Customers from OATT Shortfalls

The Draft Order directs steps toward FERC alignment because of potential under-recovery for OATT services (Draft Order, section V.C, paragraphs 107–109). Any jurisdictional approvals here should be **conditioned** to hold Nevada customers harmless from wholesale under-recovery until FERC rates are updated to reflect current costs.

V. Requested Disposition

For the reasons above, I respectfully request that the Commission:

1. **Reject** the residential/small-business daily demand charge (or require a full shadow-billing pilot with pre-go-live tools and a no-harm backstop).
2. **Rescind** 15-minute netting for Sierra; open a comprehensive valuation/technical docket and maintain monthly netting pending results.
3. **Deny** inclusion of Greenlink CWIP in rate base (or materially limit it with milestones, quarterly reporting, and claw-backs).
4. **Disallow** affiliate/corporate overhead recovery absent stringent, auditable proof and standardized schedules.

5. **Condition** jurisdictional approvals on timely FERC alignment so Nevada customers do not subsidize wholesale service shortfalls.

These modifications are necessary to satisfy **NRS 704.100** and **NRS 704.110** and to maintain the integrity of Nevada's ratemaking process.

Trisha Osborne

From: Danella Tobler-Hanief [Arbor View HS] <tobled@nv.ccsd.net>
Sent: Tuesday, September 16, 2025 11:27 AM
To: BPA
Subject: Rate Increases

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Commissioners,

As a lifelong Las Vegas, Nevada resident, I have suffered the rate increases from gas and electrical companies alike. And I am humbly asking you to reject the rate increase that Nevada Energy is proposing. Life is expensive enough.

Sincerely,

--

Ms. Danella Tobler-Hanief
English 12 Educator
(702)799-6660 x 2221
tobled@nv.ccsd.net

"Stand for what is right. Even if it means standing alone." Unknown

Trisha Osborne

From: Lisa Armstrong <lisaus@me.com>
Sent: Tuesday, September 16, 2025 12:04 PM
To: BPA
Subject: Rate Increases

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please add my vote for no rate increase. Thank you.
Sent from my iPhone

Trisha Osborne

From: Angela Silver <ms.wilson6869@gmail.com>
Sent: Tuesday, September 16, 2025 11:17 AM
To: BPA
Subject: Rate hikes

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good afternoon, I am asking in good faith that you guys please reject all rate hike across the board. We can barely afford the rates implemented now.
Thank you