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25-12031

Public Utilities Commission of Nevada
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In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s Amanda Sanchez

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This filing has been electronically filed and deemed to be signed by an authorized
agent or
representative of the signer(s) and
Solar Energy Industries Association



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May 15, 2026

Trisha Osborne
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701

Re: Docket 25-12031 – Application of Nevada Power Company d/b/a NV Energy, filed under Advice Letter No. 562, to revise Tariff No. 1-B to modify Generating Facility Interconnections Rule No. 15 Pursuant to the Order issued in Docket No. 24-05041.
Docket 25-12032 - Application of Sierra Pacific Power Company d/b/a NV Energy, filed under Advice Letter No.689-E, to revise Tariff No. 1 to modify Generating Facility Interconnections Rule No. 15 pursuant to the Order issued in Docket No. 24-05041.

Dear Ms. Osborne:

Please find enclosed for filing, Comments of the Solar Energy Industries Association (“SEIA”).

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

/s/Lucas M. Foletta

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Partner
of Holland & Hart LLP

LMF:ald

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BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Application of Nevada Power Company d/b/a NV Energy, filed under Advice Letter No. 562, to revise Tariff No. 1-B to modify Generating Facility Interconnections Rule No. 15 pursuant to the Order issued in Docket No. 24-05041.

Docket No. 25-12031

Application of Sierra Pacific Power Company d/b/a NV Energy, filed under Advice Letter No. 689-E, to revise Tariff No. 1-B to modify Generating Facility Interconnections Rule No. 15 pursuant to the Order issued in Docket No. 24-05041.

Docket No. 25-12032

**COMMENTS OF
THE SOLAR ENERGY INDUSTRIES ASSOCIATION ON
APPLICATIONS TO REVISE GENERATING FACILITY INTERCONNECTIONS
RULE NO. 15 TARIFF SHEETS**

/s/Benjamin Piiru

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ASSOCIATION

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**COMMENTS OF
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RULE NO. 15 TARIFF SHEETS**

Pursuant to Procedural Order No. 1 issued February 13, 2026, in consolidated Docket Nos. 25-12031 and 25-12032, the Solar Energy Industries Association (“SEIA”) respectfully offers the following comments on the above-captioned dockets.

I. INTRODUCTION AND BACKGROUND

On December 31, 2025, Nevada Power Company d/b/a NV Energy (“NPC”) filed under Advice Letter No. 562 an application to revise Tariff No. 1-B to modify Generating Facility Interconnections Rule No. 15 pursuant to the Nevada Public Utilities Commission’s (“Commission”) order in Docket No. 24-05041.¹ On the same date, Sierra Pacific Power Company d/b/a NV Energy (“SPPC”) filed under Advice Letter No. 689-E an application to revise Electric Tariff No. 1 to modify Generating Facility Interconnections Rule No. 15 pursuant to the same

¹ Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 562, Docket No. 25-12031, at 1 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025).

order.² On February 13, 2026, the Commission issued Procedural Order No. 1, which consolidated Docket Nos. 25-12031 and 25-12032 for hearing purposes and established the procedural schedule in these matters.³ These comments are submitted in response to the proposed revisions to Rule No. 15 as permitted by Procedural Order No. 1. As the NPC and SPPC proposed revisions to Rule No. 15 are substantively identical except for certain net metering application fees, SEIA refers in these comments to “NVE” when discussing provisions common to both tariffs.

II. NVE’S REVISIONS ARE POSITIVE, BUT FURTHER REVISION IS NEEDED TO BRING THE TARIFF TO MODERN STANDARDS

NVE’s proposed revisions meaningfully improve the current tariff in several respects. The proposal updates the tariff to better reflect the technologies and operating configurations now routinely present in interconnection processes, including energy storage devices, vehicle-to-grid resources, advanced inverters, power control systems, limited export and non-export configurations, and microgrids.⁴ It also creates a more developed review structure than the current Rule No. 15 by establishing distinct Simplified Review, Fast Track Review, Supplemental Review, and Detailed Review pathways, and by adding provisions such as optional pre-application reports, review of the proposed reference point of applicability, a temporary interconnection authorization construct, and more detailed testing and certification criteria.⁵ Those revisions are constructive and should be retained.

² Application of Sierra Pac. Power Co. d/b/a NV Energy to Revise Electric Tariff No. 1 to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 689-E, Docket No. 25-12032, at 1 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025).

³ Procedural Order No. 1 at 2–3, Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Docket Nos. 25-12031 & 25-12032 (Nev. Pub. Utils. Comm’n Feb. 13, 2026).

⁴ Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 562, Docket No. 25-12031, Attachment 1, at 1–2, 4, 7–11, 15–16 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025).

⁵ *Id.* at 19, 25–27, 32, 37, 40–41, 60–63, 70–72 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025).

At the same time, the proposal still leaves substantial work to be done before Rule No. 15 can fairly be described as a modern interconnection tariff. In particular, additional revision is needed to provide timeline certainty, cost certainty, cost containment, standardization of utility decision-making, and to ensure that metering, communications, study assumptions, and dispute resolution requirements are proportional and transparent.

A. Improvements NVE Made That Should Be Retained

NVE made several beneficial changes in its proposed revisions to Rule No. 15. The proposal updates the tariff to account for technologies and operating configurations that now routinely appear in the distributed interconnection process, including energy storage devices, vehicle-to-grid resources, power control systems, limited export and non-export configurations, limited generation profiles, advanced inverters, microgrids, and updated testing and certification requirements.⁶ It also replaces the current tariff's less differentiated Initial Review, Supplemental Review, and Interconnection Study framework with distinct Simplified Review, Fast Track Review, Supplemental Review, and Detailed Review pathways.⁷ In addition, the proposal adds useful process features such as optional pre-application reports, review of the proposed reference point of applicability, and temporary interconnection authorization. Finally, the proposal updates the tariff's technical references to current IEEE and UL standards, and provides more structure around application modifications and technical review criteria.⁸

⁶ *Id.* at 1–2, 4, 7–11, 15–16, 70–72 (Nev. Pub. Utils. Comm'n filed Dec. 31, 2025).

⁷ Compare Nev. Power Co., Tariff No. 1-B, Rule No. 15, PUCN Sheet Nos. 93J–93K, 93AA–93AB, with Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 562, Docket No. 25-12031, Attachment 1, at 25–27, 32, 37, 40–41 (Nev. Pub. Utils. Comm'n filed Dec. 31, 2025).

⁸ Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 562, Docket No. 25-12031, Attachment 1, at 15–16, 19, 23–24, 25–32, 60–63 (Nev. Pub. Utils. Comm'n filed Dec. 31, 2025).

Those revisions are meaningful because they move Rule No. 15 away from a framework built for older and simpler generation configurations and toward one that better reflects how distributed resources are actually designed, controlled, studied, and interconnected today. Explicit discussion of modern technologies will reduce ambiguity in the application and review process, while clearer review pathways and more developed process provisions should make the tariff easier for applicants to navigate and easier for NVE to administer consistently. Further, standardization around technical requirements and specifications enables applicants and utilities to get on the same page before applications are even submitted, removing guesswork and shortening the time needed to develop designs and review them. In short, these changes improve transparency, better align the tariff with current interconnection practice, and provide a stronger foundation for further revisions.

B. NVE should include additional improvements to bring the tariff up to modern standards.

Attached as Attachment A to these comments are proposed revisions and additions that effectuate the comments below.

1. The proposed tariff should be revised to provide meaningful timeline certainty, cost certainty, and cost containment through final cost reconciliation.

The proposed tariff should be revised to provide greater certainty on both schedule and cost. Specifically, Rule No. 15 should: (1) establish defined utility and applicant deadlines for all stages between application submission and reconciliation of actual costs, and include appropriate enforcement mechanisms where such deadlines are not met; (2) require NVE to provide applicants with cost estimates that have hard percentage caps on amounts over those estimates; and (3) require NVE, at final cost reconciliation after a project achieves permission to operate (“PTO”), to provide a timely, itemized final accounting of actual costs, together with a prompt refund or invoice for any difference between estimated and actual amounts.

As drafted, the proposal provides predictability and standardization at the front of the process, but much less so after a project enters Detailed Review or utility construction. The proposal requires the Interconnection Study Agreement to set forth NVE’s schedule for completing study, facility design, and engineering work, and to include estimated or fixed-price costs for those studies and engineering.⁹ While on the right track toward achieving transparency, tariff-level required deadlines for studies are feasible and should be memorialized in the tariff. This approach is consistent with recognized interconnection best practices. The Interstate Renewable Energy Council’s (“IREC”) 2023 Model Interconnection Procedures, which reflects “the latest best practices” for faster and less costly DER interconnection, includes tariff-level study timelines. These timelines include completion of a System Impact Study within forty business days after execution of the study agreement and completion of a Facilities Study within forty-five business days after execution of the facilities study agreement.¹⁰ Memorializing study timelines in the tariff creates a predictable and consistently applied framework for study completion, rather than leaving schedules to case-by-case negotiation. That predictability improves project planning and financing for applicants and enhances queue efficiency by reducing delays, restudies, and disputes over schedule slippage.

After the study phase, utility-side construction proceeds under a “good faith efforts” standard in the proposed rules.¹¹ Under such a standard, construction could stretch well beyond utility predictions. Delays to construction timelines cause significant harm to project financials,

⁹ *Id.* at 41, 59 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025).

¹⁰ IREC, Model Interconnection Procedures, 2023 Edition, at 44–45 (<https://irecusa.org/wp-content/uploads/2023/08/IREC-Model-Interconnection-Procedures-2023-FINAL-8.23.23.pdf>).

¹¹ Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 562, Docket No. 25-12031, Attachment 1, at 59 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 § J.1.a) (providing that, after execution of applicable agreements, the Utility and/or Producer shall commence construction and installation “using good faith efforts to meet schedules and fixed or estimated costs as appropriate”).

including through project value erosion, contractual penalties, and the expiration of local permits or approvals. Understanding that construction timelines are difficult to predict early in the interconnection process, establishing enforceable deadlines for construction would not be feasible. However, timely and frequent communication between NVE and the applicant should be expressly delineated to inform the applicant as to the progressing status of procurement and construction, and allow opportunities to mitigate potential harm through collaborative efforts such as enabling an applicant to take on some of the utility's scope of work.

The same problem exists on the cost side. The proposal does not establish sufficient guardrails to ensure that applicants can reasonably predict total interconnection costs by the end of the process. Nor does it establish a structured post-PTO reconciliation process that requires NVE to explain how final costs were derived. Applicants need to make business decisions based on the best information available, and if they cannot reasonably rely on cost estimates provided by the utility, fewer projects will be planned in the state, fewer projects will reach PTO, and more disputes over cost will tie up utility resources.

Cost certainty also improves utility performance and encourages investment in the state. Requiring NVE to keep costs within a defined contingency threshold, or to explain material deviations, creates an incentive to prioritize accuracy and efficiency in study work, planning, engineering, and construction. Under the current framework, applicants bear all the financial risk associated with cost uncertainty and lack of cost containment. Meanwhile, NVE retains primary control over the factors that drive those costs, including equipment selection, engineering design, procurement, and construction, and they have little to no incentive to keep costs reasonable and under control.

The proposal also does not establish a clear process for reconciling actual costs after a project goes online. The absence of a defined process and standardized accounting of actual costs, including providing a detailed summary of materials, labor, and overhead, creates ambiguity and uncertainty, and increases the likelihood of billing-related disputes. A transparent reconciliation process would reduce confusion on both sides, lower the risk of incorrect billing, and reduce the number of applicant complaints, thereby conserving already constrained utility resources.

Massachusetts provides a useful and highly effective model for built-in cost caps that should be applied in Nevada. Massachusetts' distributed generation tariff provides that, where substantial system modifications are identified, the Impact Study will produce an estimate for interconnection costs within $\pm 25\%$.¹² It also requires the utility to advise the customer in writing of any study-cost increase only up to a total increase of 10%, with costs above that threshold borne by the utility, and it establishes a final accounting process under which the customer may request a report of actual costs and receive any refund owed within 45 business days after the report is provided.¹³ The Massachusetts Department of Public Utilities ("DPU") considered this framework because it concluded that interconnection policy must balance efficient price signals with "reasonable certainty around interconnection costs" so that projects can be developed and financed effectively.¹⁴ The DPU explained that cost assignment and recovery should "strike a balance

¹² Mass. Elec. Co. & Nantucket Elec. Co. d/b/a Nat'l Grid, M.D.P.U. No. 1579, Standards for Interconnection of Distributed Generation § 3.4(e), at 30 (eff. Apr. 15, 2025) (providing that, where system modifications are substantial, the Impact Study will produce an estimate for modification costs "within $\pm 25\%$ ").

¹³ *Id.* at 130 (eff. Apr. 15, 2025) (requiring written notice of cost increases up to a 10% increase cap, providing that costs above the 10% cap are borne solely by the Company, and establishing final accounting procedures with payment or refund due within forty-five business days after provision of the final accounting report).

¹⁴ Investigation by the Department of Public Utilities on Its Own Motion into Electric Distribution Companies' (1) Distributed Energy Resource Planning and (2) Assignment and Recovery of Costs for the Interconnection of Distributed Generation, D.P.U. 20-75, Attachment A, Distributed Energy Resource Planning Proposal and Request for Comments, at 9 (Mass. Dep't Pub. Utils. Oct. 22, 2020) (explaining that interconnection cost assignment and recovery reforms must "strike a balance between establishing clear price signals to drive efficient investment while providing reasonable certainty around interconnection costs to allow for effective project development and financing").

between establishing clear price signals to drive efficient investment” and providing enough certainty to support project development and financing.¹⁵ Establishing a reasonable contingency threshold, together with a defined cap on cost increases, better aligns incentives by requiring NVE to manage upgrade costs within a predictable range. This approach preserves a reasonable contingency for unforeseen conditions while ensuring that cost overruns resulting from estimation error, design changes, or execution inefficiencies are not borne entirely by the applicant.

In addition to the tariff revisions discussed above, the Commission should direct NVE to evaluate whether advanced automation, including AI-enabled tools where appropriate, can reduce the time and cost associated with interconnection application review, deficiency screening, study administration, and queue management. DOE has recognized that updating grid-modeling software and increasing automation of interconnection studies and application processing are priority areas for improving interconnection timelines, and has initiated the AI for Interconnection program to explore the use of AI techniques to modernize the interconnection application process.¹⁶ Any such evaluation should be technology-neutral and should preserve engineering judgment, safety and reliability standards, data security, applicant confidentiality, and transparent decision-making. The goal should not be to replace tariff standards with automated decision-making, but to determine whether validated tools can help NVE administer those standards more efficiently and consistently.

Rule No. 15 should therefore be revised to provide enforceable timing throughout the entire interconnection process, a meaningful cost envelope with a hard cap on contingency, and a

¹⁵ *Id.*

¹⁶ U.S. Dep’t of Energy, AI for Interconnection (AI4IX) (explaining that DOE’s AI4IX program is intended to modernize the interconnection application process and significantly reduce the time required to review, approve, and commission new generation interconnections); U.S. Dep’t of Energy, AI for Energy: Opportunities for a Modern Grid and Clean Energy Economy 21–22 (Apr. 2024) (identifying automation of interconnection studies and application processing as a priority area for improving interconnection times, while noting the need for further testing, validation, data transparency, privacy, and security).

complete itemized reconciliation statement. Without those features, the proposal improves the front end of the process but still leaves too much uncertainty where applicants and NVE can least afford it.

2. The Dispute Resolution Process Should Require Prompt Collaboration and Incorporate an Ombudsperson Process for Informal Complaints.

The dispute resolution provisions in Rule No. 15 should be revised to provide parties a more practical opportunity to resolve disputes on a prompt timeline before resorting to the formal Commission process. At minimum, the tariff should: (1) permit disputes to be initiated through any reliable written communication method, including email, rather than only by “letter”; (2) require NVE to confer with the aggrieved party within five business days to schedule an initial dispute-resolution meeting; (3) require that such meeting occur no later than twenty business days after receipt of the written dispute; (4) require the parties to continue to make good-faith efforts to resolve the dispute and exchange reasonably necessary information before escalation; and (5) establish a utility and/or Commission ombudsperson to receive and help resolve informal disputes that do not yet require formal Commission intervention.

As drafted, the proposed dispute resolution process is too rigid and too slow. Like the current Rule No. 15, the proposal requires the aggrieved party to initiate the dispute by writing a “letter” and then gives the parties up to forty-five calendar days to meet and confer.¹⁷ If the dispute is not resolved within forty-five calendar days after the date of the receipt of the letter, the matter may then be submitted to the Commission.¹⁸ That structure is ill-suited to the reality of how

¹⁷ Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 562, Docket No. 25-12031, Attachment 1, at 64 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 § K.2.a–b) (requiring the dispute to be reduced to writing in a “letter” and requiring the parties’ authorized representatives to meet and confer within forty-five calendar days after the Utility receives the dispute letter).

¹⁸ *Id.*

disputes arise in practice and are negotiated, and it undercuts the urgency necessary to ameliorate project concerns before timelines and costs begin to compound.

The existing structure is also too narrow in its conception of collaboration. The tariff assumes that one formal meeting will either resolve the dispute or send the parties to the Commission for a final resolution.¹⁹ In practice, some disputes can be resolved through clarification of study assumptions, exchange of supporting cost information, or follow-up discussions among technical and commercial personnel. In other words, there must be an opportunity to meaningfully collaborate and negotiate to reach a mutually agreeable resolution, and the contemplation of only 45 days to resolve a dispute is insufficient to meet that end. The tariff should therefore provide more room for timely, good-faith collaboration before matters harden into formal disputes.

An ombudsperson would further improve the operation of the tariff. Not every dispute warrants immediate escalation to a formal Commission proceeding. A neutral point of contact at the Commission for informal interconnection disputes, or a single point of contact serving as an ombudsperson at the utility, could help identify misunderstandings early, facilitate communication, and elevate concerns before delay or cost compounds. In this role the ombudsperson could serve as a strategic collaborator who is able to recognize overarching issues in how interconnection functions, and seek solutions to resolve those issues. An ombudsperson would not replace the need for formal disputes outright, but it would supplement them by creating a lower-friction path for resolving smaller disputes before they become larger ones.

For those reasons, the Commission should revise Rule No. 15 to require prompt meet-and-confer timelines, continued good-faith collaboration, and an ombudsperson for informal disputes.

¹⁹ *Id.*

Without those changes, the tariff will continue to rely on a dispute resolution structure that is too slow and too formalistic for modern interconnection practice.

Lastly, the tariff should clearly specify that if a dispute does go to the Commission for resolution, the Commission's decision is a final decision of the Commission and ripe for judicial review.

3. The Tariff Should Limit Utility Discretion and Require Objective, Transparent and Consistently Applied Criteria

The proposed tariff should be revised to ensure that interconnection determinations are based on objective, transparent, and consistently applied criteria. At minimum, Rule No. 15 should: (1) require that all screening and study determinations be based on defined technical thresholds or clearly articulated engineering standards; (2) limit the use of open-ended utility discretion in determining application completeness, material modifications, and study outcomes; and (3) require NVE to provide written, technically supported explanations for any determination that results in project failure, additional study, or reassignment to a different review track.

As drafted, the proposed tariff includes provisions that allow NVE to make determinations based on subjective or non-quantifiable factors, which could result in two different reviewers coming up with two different outcomes.²⁰ While the judgment of expert engineers is crucial to ensuring the reliability and safety of the system, that judgment should be exercised within a framework of defined standards. Where criteria are not clearly defined, applicants are left without a reliable and predictable basis to understand how their projects will be evaluated or why a project passed or failed a given screen. The lack of transparency in the proposed rules reduces

²⁰ *Id.* at 22, 24, 39 (Nev. Pub. Utils. Comm'n filed Dec. 31, 2025) (allowing rejection of applications based on the Utility's "reasonable judgment and discretion," addressing certain modifications "on a case-by-case basis" and "at [the Utility's] discretion," and including Screen M criteria such as whether loading along the Line Section is "uniform or evenly distributed" and whether operational flexibility is reduced).

predictability and increases the likelihood of disputes, overall increasing the time and cost required to get projects online.

Certain current screening criteria illustrate this issue. For example, the requirement that “loading along the Line Section is uniform or evenly distributed” is not an objective or measurable standard and does not correspond to a defined reliability threshold.²¹ Distribution systems are rarely uniform in practice, and non-uniform loading does not, by itself, indicate a constraint or violation. To the extent uneven loading creates actual system impacts, those impacts are already captured in existing voltage, thermal, and protection screens. As drafted, this provision introduces a subjective factor that can be applied inconsistently and does not provide applicants with a clear or predictable basis for evaluation.

Other criteria, while grounded in legitimate operational concerns, are not sufficiently defined. For example, the provision addressing whether a proposed Generating Facility reduces operational flexibility by limiting feeder transfer capability reflects a real planning consideration.²² However, the tariff does not define the transfer scenarios to be evaluated, the loading assumptions that apply, or the thresholds that would constitute a failure. Without such definition, this provision introduces an open-ended study requirement that may require applicants to address hypothetical system configurations beyond the direct impacts of their projects.

More broadly, the proposed tariff allows NVE to reject applications or make material determinations based on “reasonable judgment and discretion” in areas such as application

²¹ *Id.* at 39 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 § F.4, Screen M) (requiring the Utility to consider whether “the loading along the Line Section is uniform or evenly distributed”).

²² *Id.* at 39 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 § F.4, Screen M) (requiring the Utility to consider whether “operational flexibility is reduced by the proposed Generating Facility, such that transfer of the Line Section(s) to which the Generating Facility is Interconnected to a neighboring distribution feeder/substation may trigger overloads or voltage issues”).

completeness and material modification review.²³ These provisions should be narrowed to ensure that application review and project evaluation are governed by clear and consistently applied rules rather than open-ended discretion.

The interconnection process does not require the elimination of engineering judgment, but it does require that such judgment be exercised within a transparent and bounded framework. Requiring objective criteria, clearly defined study conditions, and written technical justification for adverse determinations will improve consistency, reduce disputes, and provide applicants with a clearer understanding of how their projects will be evaluated.

For these reasons, Rule No. 15 should be revised to limit subjective screening criteria, define the conditions under which operational flexibility is evaluated, and ensure that all interconnection determinations are supported by objective standards and documented technical justification.

4. The Tariff Should Provide Clear and Predictable Standards for Application Deficiencies and Limit Rejection Risk

The proposed tariff should be revised to ensure that application review is governed by clear, objective, and consistently applied standards, and that applicants are provided a meaningful opportunity to cure deficiencies without unnecessary risk to queue position. The proposal appropriately requires NVE to identify application defects in sufficient detail to enable correction and includes a reset mechanism where NVE later identifies a previously existing defect that it failed to identify in an earlier review.²⁴ Those protections should be retained. However, Rule No.

²³ *Id.* at 22, 24 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 §§ E.2.i, E.3) (allowing rejection of certain applications based on the Utility’s “reasonable judgment and discretion” and providing that certain modifications will be addressed on a case-by-case basis at the Utility’s discretion).

²⁴ *Id.* at 21–22 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 § E.2.i) (requiring the Utility to specify defects “in sufficient detail to enable the Applicant to correct the Application” and providing that, where the Utility later identifies a previously existing defect that was not identified in a prior review, “the iterative review process shall reset”).

15 should still be revised to: (1) limit rejection of applications to material deficiencies that prevent meaningful review; (2) narrow the “reasonable judgment and discretion” standard; (3) define any “good faith” submission standard using objective criteria; and (4) ensure that applicants are not forced to reapply and lose queue position for curable, non-material deficiencies or deficiencies caused by NVE’s own errors or omissions.

As drafted, the proposed tariff allows NVE to reject applications after a limited number of deficiency cycles and permits rejection based on “reasonable judgment and discretion” regarding completeness or whether an application was submitted in good faith.²⁵ While it is reasonable to require applicants to submit complete and accurate information, these provisions introduce unnecessary subjectivity into what should be a largely administrative review process. Application completeness should be determined based on clearly defined criteria, not generalized assessments of applicant intent or quality of submission. The risk associated with rejection is obvious. Loss of queue position materially impacts project viability, particularly where interconnection timelines are long and system conditions evolve over time. Applicants therefore require a clear and predictable process for curing deficiencies. A framework that allows rejection based on subjective determinations creates uncertainty and increases the likelihood that projects will be rejected for reasons that could have been addressed through a clearer cure process.

This structure also contributes to inefficiency in the interconnection queue. Where applicants are uncertain whether an application will be deemed complete or subject to rejection based on subjective criteria, they are more likely to submit multiple or overly conservative

²⁵ *Id.* at 21–22 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 § E.2.i) (providing that applications not fully corrected after two subsequent Utility reviews may be rejected at the Utility’s discretion and that applications may be rejected where, in the Utility’s “reasonable judgment and discretion,” they are materially incomplete, lack substantial required information, or were submitted solely to obtain queue position without a good-faith effort to submit a complete application).

applications to preserve optionality. This behavior increases administrative burden, contributes to queue congestion, and ultimately undermines the efficiency of the interconnection process.

A more structured approach to application deficiencies would improve outcomes for both applicants and NVE. Retaining NVE's obligation to identify defects clearly, narrowing rejection authority to material issues, and ensuring that applicants have a reasonable opportunity to cure defects would reduce unnecessary resubmissions, improve application quality, and decrease the likelihood of disputes over application handling. Further, there should be an explicit cure option for defects caused by or induced by NVE's representations to an applicant.

For these reasons, Rule No. 15 should be revised to limit subjective rejection authority, retain complete and transparent deficiency identification requirements, and ensure that applicants are provided a fair and predictable opportunity to cure deficiencies without unnecessary risk to queue position.

5. The Tariff Should Narrow the Definition of Material Modifications and Avoid Automatic Reapplication for Non-Impactful Changes

The proposed tariff should be revised to ensure that modifications trigger reapplication only where they materially affect system conditions. The proposal correctly recognizes that like-for-like replacement of existing equipment that does not increase system output or change generator operating modes should not require notice, a new application, utility approval, or an updated agreement. That protection should be retained and clarified. At minimum, Rule No. 15 should: (1) limit material modification determinations to changes that increase approved export capability, materially alter system impacts, materially change prior study assumptions, or require new utility facilities; (2) clarify that in-kind or like-for-like equipment substitutions include inverter replacements where system output and grid-interactive operating characteristics do not change; (3) expressly exclude firmware updates and control adjustments that do not affect grid

interaction from material modification treatment; and (4) require any determination that a modification is material to be based on objective criteria and supported by written technical justification.

As drafted, Table 2 provides useful structure, but still creates unnecessary risk by treating certain changes as automatic triggers for reapplication even where they may not increase export capability or materially change system impacts. For example, Table 2 requires a new application for the addition of a ≤ 50 kW non-exporting resource, such as an energy storage device (“ESD”) or vehicle-to-grid (“V2G”) electric vehicle (“EV”) charger configured for non-export, even where the modification does not increase export capability at the point of common coupling (“PCC”). That type of change should not automatically require a full new application. Instead, the tariff should provide for an expedited modification review limited to the actual system impacts presented by the change, including load, protection, power quality, control, metering, and any other relevant operational impacts.

If NVE determines that such a modification materially changes prior study assumptions, requires new utility facilities, or creates a demonstrable safety or reliability concern, NVE should provide a written technical explanation identifying the specific basis for that determination. If no such impact is identified, the modification should proceed through an amendment or notice process rather than a full new application. This approach preserves NVE’s ability to evaluate legitimate system impacts without treating every small non-export addition as though it necessarily requires a new interconnection request.

In-kind equipment changes present another clear example. Replacement of inverters or other equipment with like-for-like components that do not increase approved export capability, do not increase system output, and do not alter grid-interactive operating characteristics should not

be treated as a material modification because such changes are not expected to materially change system impacts.²⁶

Similarly, firmware updates that do not affect grid interaction should not be treated as material. Treating these types of changes as material modifications does not improve system reliability, and instead introduces delay, increases cost, and creates unnecessary queue churn.

For these reasons, Rule No. 15 should be revised to limit material modification determinations to changes that affect system impact, clarify that in-kind inverter replacements and non-impactful firmware updates are not material modifications, and replace automatic reapplication for small non-export additions with an expedited review or amendment process tied to actual system impacts.

6. Communications, Control, and Telemetry Requirements Should Be Limited to Demonstrated Need and Proportional Cost

The proposed tariff should be revised to ensure that communications, control, and telemetry requirements are limited to clearly defined reliability needs and implemented using the least-cost, least-intrusive means available. The proposal includes useful limiting language tying direct communications to Emergency or Unsafe Operating Conditions, voluntary programs or tariffs, and the absence of alternative cost-effective communication pathways.²⁷ Those limits should be retained and strengthened. At minimum, Rule No. 15 should: (1) clarify that communications capability does not create general utility control authority over customer resources; (2) limit utility

²⁶ See e.g., Ill. Admin. Code tit. 83, § 466.125(c)(1)(D), (F), (e)(1)(D), (F) (treating replacement of generating equipment, including inverters, as material only where the substitute equipment is not a like-kind modification, and separately treating changes to certified inverter specifications, control settings, or configuration as material).

²⁷ Application of Nev. Power Co. d/b/a NV Energy to Revise Tariff No. 1-B to Modify Generating Facility Interconnections Rule No. 15, Advice Letter No. 562, Docket No. 25-12031, Attachment 1, at 55 (Nev. Pub. Utils. Comm'n filed Dec. 31, 2025) (proposed Rule No. 15 § G.12.c) (providing that direct communications shall be made available at the Utility's request where communications are required to prevent an Emergency or Unsafe Operating Conditions, or to enable customer participation in voluntary programs or tariffs where no alternative cost-effective communication pathway can be established).

control authority to emergency, unsafe operating, or clearly defined tariff or program conditions; (3) require NVE to use the least-cost feasible communications pathway; (4) clarify cost responsibility for communications and telemetry equipment and ongoing services; and (5) scale telemetry requirements based on project size and system impact.

The tariff should not allow NVE broad or open-ended authority to monitor or control customer resources outside of clearly defined circumstances as communications capability does not, by itself, justify control authority. Direct communications and control capability should be tied to specific, identifiable use cases, such as emergency conditions, protection of system reliability, or participation in Commission-approved programs. Without those guardrails, applicants face uncertainty regarding when and how NVE may exercise control over their facilities, which introduces both operational risk and potential commercial constraints.

Additionally, requirements that applicants provide communications infrastructure can represent a non-trivial cost component of interconnection. The tariff should make clear that where such requirements are imposed for utility benefit, they should be justified and implemented using the least-cost feasible alternative. Otherwise, communications requirements risk becoming another source of unpredictable and potentially unnecessary cost.

Telemetry requirements should likewise be proportional. The proposed tariff appropriately acknowledges that telemetry at the point of common coupling should only be required where less intrusive or more cost-effective options are unavailable. That principle should be applied consistently. Smaller projects or projects with limited system impact should not be subject to the same telemetry requirements as larger or more complex facilities.

Clear, bounded communications and control provisions will benefit both applicants and NVE. Applicants will have greater certainty regarding operational obligations and cost exposure,

while NVE will retain the tools necessary to ensure system reliability without creating unnecessary complexity or dispute risk.

For these reasons, Rule No. 15 should be revised to retain and strengthen the proposal's existing guardrails, limit communications and control requirements to clearly defined reliability or program needs, ensure proportional application of telemetry requirements, and provide transparent allocation of associated costs.

7. Metering Requirements Should Be Proportional and Should Not Require Separate Metering for Energy Storage in All Cases

The proposed tariff should be revised to ensure that metering requirements are proportional to project size and system impact, and that energy storage devices are not subject to unnecessary or duplicative metering requirements. The proposal includes useful proportionality language for telemetry and metering generally, including consideration of less intrusive or more cost-effective options, project size relative to metering cost, and other means of obtaining data.²⁸ That language should be retained and applied consistently. At minimum, Rule No. 15 should: (1) eliminate any presumption that energy storage installations require a separate utility meter; (2) allow the use of existing revenue-grade meters, inverter data, or power control system data where such data is sufficient to meet NVE's operational needs; (3) require that any additional metering be justified based on a specific operational or reliability need; and (4) ensure that metering requirements are scaled appropriately to the size and complexity of the project.

As drafted, the proposed tariff contains language that may be interpreted to require utility-owned, bi-directional interval metering for all energy storage installations. While metering is

²⁸ *Id.* at 56–57 (Nev. Pub. Utils. Comm'n filed Dec. 31, 2025) (proposed Rule No. 15 § H.4, H.6.d) (providing that telemetry and metering at the PCC may be required where less intrusive or more cost-effective options are unavailable, requiring consideration of project size relative to metering/monitoring cost and other means of obtaining data, and limiting Telemetry to circumstances where less intrusive or more cost-effective real-time data options are unavailable).

necessary in certain cases to support system operations, settlement, or program participation, a blanket requirement for separate metering for all storage systems is not justified where equivalent data can be obtained through other means.

Modern distributed energy resources, including energy storage systems, are capable of providing detailed operational data through inverters, power control systems, and other integrated platforms. In many cases, these systems can provide the same or better visibility into system performance than a separate utility meter. Requiring additional metering in those cases introduces unnecessary cost and complexity without corresponding operational benefit.

A one-size-fits-all approach to metering also fails to account for differences in project scale and system impact. Smaller projects or projects with limited export capability may not warrant the same level of metering infrastructure as larger or more complex facilities. Requiring identical metering configurations across all projects increases costs for applicants without improving system reliability. A more flexible approach that allows NVE to rely on existing data sources where sufficient, and requires additional metering only where justified, would better align metering requirements with actual system needs. This approach would reduce unnecessary costs, improve transparency, and maintain the operational visibility required for safe and reliable system operation.

For these reasons, Rule No. 15 should be revised to remove any blanket requirement for separate metering of energy storage systems, retain and consistently apply the proposal's proportionality principles, require that additional metering be justified based on demonstrated need, and ensure that metering requirements are proportional to project characteristics and system impact.

8. Storage and Controlled Resources Should Be Studied Based on Proposed Operating Characteristics

The proposed tariff should be revised to ensure that energy storage systems and other controlled resources are studied based on their proposed and enforceable operating characteristics, rather than conservative or worst-case assumptions that do not reflect how the resource will actually operate. At minimum, Rule No. 15 should: (1) require NVE to model storage systems based on proposed charge and discharge profiles, including any limitations on charging during peak load periods; (2) require that limited export configurations and power control systems be reflected in study assumptions; and (3) allow applicants to rely on enforceable operational controls to mitigate system impacts without being penalized through overly conservative study assumptions.

As drafted, the proposed tariff recognizes concepts such as limited export, limited generation profiles, and power control systems.²⁹ It also allows applicants, after receiving Interconnection Study results, to submit updated design or operating characteristics, including through use of power control systems (“PCS”) or a Limited Generation Profile, and request updated study results without a new application or additional study fee.³⁰ Those provisions are useful and should be retained. However, modeling storage systems under assumptions that do not reflect their actual or intended operation can materially overstate system impacts. This can lead to unnecessary identification of system upgrades, increased interconnection costs, and longer study timelines. In effect, applicants may be required to pay for system conditions that their projects are designed to avoid.

²⁹ *Id.* at 7, 11, 43 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (defining Limited Export, Limited Generation Profile, and PCS, and proposing requirements for Non-Exporting and Limited Export Generating Facilities).

³⁰ *Id.* at 41 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (proposed Rule No. 15 § F.6.e) (allowing an Applicant, after receiving Interconnection Study results, to submit modifications to design, planning, or operating characteristics, including through use of a PCS or Limited Generation Profile, and request updated study results without submitting a new Application or paying an additional study fee).

Modern energy storage systems are capable of highly controlled and predictable operation. Power control systems, inverter settings, and other control mechanisms can be used to limit export, restrict charging during peak periods, and otherwise shape system behavior in ways that reduce grid impacts. Where such controls are proposed and can be enforced through the interconnection agreement, they should be reflected in the study assumptions used by NVE. Failure to account for these operational characteristics undermines the value of advanced controls and discourages their use. It also creates inconsistency in the interconnection process, as applicants may be incentivized to propose overly conservative designs simply to avoid adverse study results, rather than optimizing system performance.

The tariff should also provide clearer standards for approval of PCS. PCS is a critical tool for limiting export and managing system impacts, and therefore directly affects both study outcomes and interconnection costs. The proposal includes a Certified PCS option, but also leaves approval of certain PCS technologies, alternative control architectures, and uncertified control systems to NVE on a case-by-case basis at its discretion.³¹ Determinations regarding whether a PCS is acceptable should be based on objective, defined criteria rather than open-ended utility discretion. Without such standards, applicants face uncertainty as to whether proposed controls will be recognized in the study process, which undermines the effectiveness of limited export and controlled operation strategies. A more accurate and consistent approach is to align study assumptions with enforceable operating conditions. If a project is designed and committed to operate within defined limits, those limits should form the basis of the interconnection study. This

³¹ *Id.* at 10–11, 43–44 (Nev. Pub. Utils. Comm’n filed Dec. 31, 2025) (defining PCS to include Advanced Inverter-based systems or other Certified technologies approved by the Utility “on a case-by-case basis at its discretion,” providing a Certified PCS option for Non-Exporting or Limited Export facilities, and allowing use of an uncertified PCS, internal transfer relay, energy management system, or other hardware or software only if approved by the Utility “on a case-by-case basis at its discretion”).

approach preserves system reliability while avoiding unnecessary costs and delays associated with overly conservative modeling.

Finally, the proposed tariff should ensure that requirements applicable to V2G and vehicle-to-home (“V2H”) configurations are proportional to the actual operating mode and grid interaction of the resource. Where a bidirectional electric vehicle or electric vehicle supply equipment does not export to the grid, operates only in backup or islanded mode, or is otherwise controlled to avoid export while grid-connected, it should not be subject to the same requirements as a continuously exporting generating facility. Requirements should be tied to demonstrated system impacts, including export capability, parallel operation, protection requirements, and communications needs. Overly broad treatment of V2G and V2H resources risks discouraging deployment of emerging technologies without corresponding reliability benefits.

For these reasons, Rule No. 15 should be revised to require that storage systems and other controlled resources be studied based on their proposed and enforceable operating characteristics, including limited export and controlled charging profiles, rather than default worst-case assumptions.

9. Requirement for Volt-Watt Settings to be Enabled Should be Removed

In recognition of the potential benefits of enabling volt-watt but in order to prevent unwarranted curtailment, the proposed tariff should not require enablement as a default but instead offer it as an option for applicants or when there is a demonstrated system need.

III. CONCLUSION

NVE’s proposed revisions to Rule No. 15 represent a meaningful step toward a more modern interconnection tariff. The proposal better reflects current distributed energy technologies, provides a more developed review structure, updates technical standards, and adds several useful process improvements. Those revisions should be retained.

However, additional revisions are necessary before Rule No. 15 can provide the level of certainty, transparency, and consistency needed for an efficient interconnection process. The revisions suggested here not only benefit applicants but also improve tariff administration for NVE by reducing unnecessary disputes, limiting queue churn, improving the quality of applications and project designs, and providing clearer rules for both sides. A tariff that provides predictable timelines, reliable cost estimates, transparent reconciliation, and objective review criteria will better support viable projects and conserve utility and applicant resources.

For these reasons, SEIA respectfully requests that the Commission require further revisions to Rule No. 15 consistent with the recommendations set forth above. With those changes, the Commission can preserve the constructive elements of NVE's proposal while ensuring that Rule No. 15 provides a fair, transparent, and workable path to interconnection.

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Section B — Definitions

Material Modification(s): ~~A change(s) or replacement of generating equipment, that is not a like-kind substitution in size, ratings, impedances, efficiencies, or capabilities of the equipment specified in the original Application, IOA. Table 2 in Section E.3 of this Rule provides guidance regarding what changes to the existing circumstances of a Generating Unit's or Generating Facility's equipment or operation constitute a Material Modification.~~

A change(s) or replacement of generating equipment, or a modification to the operation of a Generating Facility, that materially increases the impacts of the Generating Facility on the Utility's Distribution System, including by increasing approved Export capability at the PCC, materially changing the Generating Facility's operating characteristics in a manner that affects grid interaction, materially changing prior study assumptions or study results, or requiring additional Utility-owned Interconnection Facilities or Distribution System improvements.

A like-kind or like-for-like substitution of equipment, including inverter replacement, that does not increase approved Export capability, does not increase system output beyond the amount specified in the IOA, and does not alter grid-interactive operating characteristics shall not constitute a Material Modification. Firmware updates or control adjustments that do not affect grid interaction, approved Export capability, operating mode, protection settings, or prior study results shall not constitute a Material Modification.

Table 2 in Section E.3 of this Rule provides guidance regarding what changes to the existing circumstances of a Generating Unit's or Generating Facility's equipment or operation constitute a Material Modification.

Power Control System (PCS): A system that limits or controls the generation output of Generators or a Generating Facility, including ESDs or Vehicle-to-Grid EVs, or the load requirement of such technologies to enforce Limited Export amounts, Non-Exporting operation, Limited Generation Profiles, ESD or Vehicle-to-Grid EV charge/discharge limits, or other allowable operating characteristics. ~~Such a system may be Advanced Inverter-based or based upon other Certified technologies as approved by the Utility on a case-by-case basis at its discretion and may establish or manage a Limited Generation Profile or Limited Export amount. A Certified PCS shall conform to Underwriters Laboratory (UL) 3141 only if and when such standard is fully approved, and then, only after its implementation date and acceptance by the Utility for use in this Rule.~~ Such a system may be Advanced Inverter-based or based upon other Certified technologies, relay-based schemes, energy management systems, or other control architectures that satisfy

objective technical criteria under this Rule and are capable of reliably enforcing the applicable Limited Export amount, Non-Exporting operation, Limited Generation Profile, charge/discharge limit, or other operating characteristic. Utility approval of a PCS or other control architecture shall not be unreasonably withheld or delayed. If the Utility determines that a proposed PCS or control architecture is not acceptable, the Utility shall provide a written explanation identifying the technical basis for its determination and the modifications, if any, that would allow the PCS or control architecture to be accepted.

Section E — Application for Interconnection

2. Application Process

i. Applications Containing Defects

~~(2) Any Application containing defects that are not fully corrected by the Applicant after two subsequent Utility reviews of the Application in addition to the Utility's first review may be rejected at the Utility's discretion, provided the Utility and the Applicant have worked in good faith, and in a timely manner, to assist the Applicant in submitting a correct and complete Application.~~ Any Application containing material defects that are not fully corrected by the Applicant after two subsequent Utility reviews of the Application in addition to the Utility's first review may be rejected by the Utility only where such defects prevent the Utility from performing meaningful review under this Rule, provided the Utility and the Applicant have worked in good faith, and in a timely manner, to assist the Applicant in submitting a correct and complete Application. Non-material defects that do not prevent meaningful review shall not be grounds for rejection of an Application or loss of queue position.

~~(3) An Application that, in the Utility's reasonable judgment and discretion, is materially incomplete, lacks substantial required information, or was submitted solely to obtain queue position without a good-faith effort to provide a correct and complete submission, shall be rejected. In such cases, the Applicant shall submit a new Application with all applicable fees. The new Application will be treated as an initial submission for purposes of queue position and Utility review.~~ An Application that is materially incomplete, lacks substantial required information necessary for the Utility to perform review under this Rule, or was submitted solely to obtain queue position without a good-faith effort to provide a correct and complete submission, may be rejected only upon written notice from the Utility identifying the specific objective basis for rejection. In such cases, the Applicant shall submit a new Application with all applicable fees. The new Application will be treated as an

initial submission for purposes of queue position and Utility review. The Utility's determination under this Section shall be subject to dispute resolution under Section K.

(4) Any defect(s) present in an Application that is(are) identified by the Utility in one of its subsequent reviews of the Application following its initial review that the Utility failed to identify in any of its previous reviews of the Application shall reset the iterative review process begun in Section E.2.i.(1). The Utility shall not base rejection on generalized assessments of the Applicant's intent or quality of submission where the Application contains sufficient information to permit meaningful review or where any defect is reasonably curable through supplemental information.

(5) Any additional defect(s) in a subsequent submission of an Application identified by the Utility that was (were) not present in the initial submitted Application which occurred in one of the subsequent submissions of the Application shall not reset the iterative review process begun in Section E.2.i.(1).

(5.5) Any additional defect(s) in a subsequent submission of an Application that are a result of or were directly or indirectly induced by a Utility Communication with a Applicant shall not reset the iterative review process begun in Section E.2.i.(1).

3. Modifications to Applications or Existing Generating Facility Installations

~~d. Any modification that does not reasonably fall within the descriptions in Table 2 shall be addressed by the Utility on a case-by-case basis. The Applicant or the Producer and the Utility shall make good faith efforts to determine if a modification constitutes a Material Modification and agree upon the resulting course of action in a timely manner, at the Utility's discretion.~~ Any modification that does not reasonably fall within the descriptions in Table 2 shall be addressed by the Utility on a case-by-case basis using objective technical criteria and with consideration of whether the modification materially increases impacts at the PCC, materially changes prior study assumptions or study results, or requires additional Utility-owned Interconnection Facilities or Distribution System improvements. The Applicant or Producer and the Utility shall make good faith efforts to determine if a modification constitutes a Material Modification and agree upon the resulting course of action in a timely manner. Any Utility determination that a modification constitutes a Material Modification shall be provided in writing and shall include the technical basis for such determination.

Section F — Technical Review Process

1. Technical Review Level Determination and Process

a. Upon the Utility's acceptance of a satisfactorily-completed Application including proposed Net Metering Systems, and receipt by the Utility of any applicable processing fee, the Utility shall determine the appropriate level of technical review required, inform the Applicant of such, and begin performing technical review in accordance with the flowchart in Attachment 2. The business day response times for the Utility's completion of Simplified Review, Fast Track Review, Supplemental Review, and review of the proposed RPA begin only after the Utility has confirmed with the Applicant that all the applicable information and fees in this Section have been submitted.

Unless otherwise specified in this Rule, any Utility determination that results in rejection of an Application, failure of a Screen, requirement for additional study, determination that a modification is a Material Modification, or refusal to accept a proposed operating limit, PCS, Limited Generation Profile, or other control architecture shall be based on objective technical criteria and shall be provided to the Applicant in writing with sufficient explanation to allow the Applicant to understand the basis for the determination and any available means to cure or mitigate the issue.

4. Supplemental Review

(c)(3) Screen M: Safety and Reliability

~~(a) — The Utility shall consider the following factors to determine if the Generating Facility may potentially impact safety and reliability on its Distribution System:~~

- ~~i. — If the Line Section has significant minimum loading levels dominated by a small number of customers (i.e., several large commercial customers);~~
- ~~ii. — If the loading along the Line Section is uniform or evenly distributed;~~
- ~~iii. — If the proposed Generating Facility is located in close proximity to the substation (i.e., less than two and one-half (2.5) electrical circuit miles), and if the Line Section from the substation to the PCC is a main backbone section of the Distribution System feeder rated for normal and emergency ampacity;~~
- ~~iv. — If the proposed Generating Facility incorporates a time delay function to prevent reconnection of the Generator(s) to the electrical Distribution System until system voltage and frequency are within normal limits for a prescribed time;~~
- ~~v. — If operational flexibility is reduced by the proposed Generating Facility, such that transfer of the Line Section(s) to which the Generating Facility is Interconnected to a neighboring distribution feeder/substation may trigger overloads or voltage issues; and~~

~~vi. If the proposed Generating Facility employs equipment or systems Certified by a recognized standards organization or NRTL to address technical issues such as, but not limited to, Islanding, reverse power flow, or voltage quality.~~

~~(b) If all of the above six conditions are met, then the Application passes this Screen. Otherwise, if any of the above six conditions are not met, then the Application fails this Screen.~~

The Utility shall determine whether the proposed Generating Facility presents a specific, identifiable, and demonstrable safety or reliability concern not otherwise addressed by Screens A through L. Any determination under this Screen shall be based on objective technical criteria, defined study conditions, and applicable Utility planning, design, or operating standards.

In applying this Screen, the Utility may consider whether:

(a) the proposed Generating Facility would cause a violation of applicable thermal, voltage, protection, power quality, or operating criteria under defined normal or contingency operating conditions;

(b) the proposed Generating Facility would reduce operational flexibility in a manner that creates a specific overload or voltage violation under a defined feeder transfer or switching scenario; or

(c) the proposed Generating Facility employs equipment or systems Certified by a recognized standards organization or NRTL to address technical issues such as Islanding, reverse power flow, or voltage quality.

The Utility shall not fail an Application under this Screen based solely on generalized or non-quantified factors, including whether loading along the Line Section is uniform or evenly distributed, unless the Utility identifies a specific technical violation caused by the proposed Generating Facility. If the Utility determines that the Application fails this Screen, the Utility shall provide the Applicant with a written explanation identifying the specific safety or reliability concern, the study condition evaluated, the applicable technical standard or criterion, and any modification or mitigation that could allow the Application to proceed.

5. Applicant's Options Meeting

~~a. When the Utility determines that the Application does not pass Simplified Review, Fast Track Review, or Supplemental Review, it shall notify the Applicant of such determination~~

~~and inform the Applicant of the basis of failure of each Screen(s). In this instance, upon Applicant's notice to the Utility to participate in a meeting to discuss Applicant's options, the Utility and the Applicant shall make good faith efforts to expeditiously schedule and hold a meeting to discuss the Applicant's options. Additionally, the Applicant may request that the Utility schedule an Applicant options meeting at any time during the technical review process and the Utility shall be required to respond within twenty (20) business days of such request.~~

When the Utility determines that the Application does not pass Simplified Review, Fast Track Review, or Supplemental Review, it shall notify the Applicant of such determination and inform the Applicant of the basis of failure of each Screen(s). In this instance, upon Applicant's notice to the Utility to participate in a meeting to discuss Applicant's options, the Utility shall confer with the Applicant within five (5) business days to schedule an Applicant's options meeting, and such meeting shall occur no later than fifteen (15) business days after the Utility's receipt of the Applicant's notice unless the Utility and Applicant mutually agree to a later date. Additionally, the Applicant may request that the Utility schedule an Applicant options meeting at any time during the technical review process, and the Utility shall respond within five (5) business days of such request and shall schedule such meeting to occur no later than fifteen (15) business days after receipt of the request unless the Utility and Applicant mutually agree to a later date.

6. Detailed Review

~~**b.** The Utility and the Applicant shall enter into an Interconnection Study Agreement which allows the Utility to perform an Interconnection Study, facility design and engineering, and to provide detailed cost estimates for actual cost billing to the Applicant at the Applicant's expense. The Interconnection Study Agreement shall set forth the Utility's schedule for completing such work and the estimated or fixed price costs of such studies and engineering.~~

The Utility and the Applicant shall enter into an Interconnection Study Agreement which allows the Utility to perform an Interconnection Study, facility design and engineering, and to provide detailed cost estimates for actual cost billing to the Applicant at the Applicant's expense. The Interconnection Study Agreement shall set forth the Utility's schedule for completing such work and the estimated or fixed price costs of such studies and engineering.

Unless the Applicant and Utility mutually agree to a different schedule in writing, the Utility shall complete the Interconnection Study within forty-five (45) business days after

execution of the Interconnection Study Agreement and receipt of any required study deposit or fee. If facility design and engineering are required following completion of the Interconnection Study, the Utility shall complete such facility design and engineering within forty-five (45) business days after the Applicant authorizes such work and remits any required deposit or fee.

These timelines may be tolled only for Applicant-caused delay, force majeure, a mutually agreed extension, or other circumstances outside the Utility's reasonable control. The Utility shall notify the Applicant in writing of any claimed tolling event and the expected effect on the schedule. If the Utility fails to meet a timeline established in this Section without a valid tolling event, the Utility shall provide a written explanation to the Applicant and the Applicant may invoke the dispute resolution process in Section K.

The cost estimate provided with the Interconnection Study shall identify, by category, the estimated costs of any required Interconnection Facilities and Distribution System improvements, including, as applicable, labor, materials, equipment, engineering, overhead, contingency, and other material cost components. The Utility shall identify the contingency included in the estimate.

For required Interconnection Facilities and Distribution System improvements, the Applicant's cost responsibility shall not exceed one hundred twenty-five percent (125%) of the Utility's cost estimate unless the increase is caused by Applicant-requested scope changes, changes in applicable law or permitting requirements, force majeure, previously unknown field conditions that could not reasonably have been identified during the study process, or other circumstances mutually agreed upon by the Utility and Applicant. The Utility shall provide a written explanation of any material deviation from the estimate.

c. Upon completion of an Interconnection Study conducted pursuant to the Interconnection Study Agreement, the Utility shall provide, in a timely manner, the Applicant with the specific Interconnection requirements and study results in a timely manner, including:

- (1) details of any identified violations of applicable design, planning, or operating criteria or standards including the estimated magnitude, duration, and/or frequency;
- (2) estimated costs of any required Interconnection Facilities and/or Distribution System improvements; and
- (3) the estimated schedule for Interconnecting the Generating Facility to accommodate execution of the agreements pursuant to Section E.2.

Within the Interconnection Study, the Utility may also identify potential modifications to the Applicant's proposed Generating Facility or operating characteristics that could avoid or reduce required Interconnection Facilities and/or Distribution System improvements and/or costs.

In performing an Interconnection Study, the Utility shall evaluate the Generating Facility based on the proposed and enforceable operating characteristics identified in the Application and to be reflected in the IOA, including, as applicable, Maximum Generating Capacity, Non-Exporting operation, Limited Export, Limited Generation Profile operation, PCS-enforced limits, ESD or V2G EV charging and discharging limits, and any other proposed operating limits. The Utility shall not assume that an ESD or V2G EV will charge during peak load periods where the Applicant proposes and commits to enforceable controls preventing such operation. If the Utility does not rely on a proposed operating limit in performing its study, the Utility shall explain in writing the technical basis for declining to do so.

Section G — Design, Technical and Operating Requirements

2. Non-Exporting and Limited Export Generating Facilities

e. A Generating Facility May Incorporate one of the following options to be designated as either Non-Exporting or Limited Export:

(2) Option 2 (Agreed-Upon Means): This option requires a Generating Facility to be designed with other control systems and/or Protective Functions mutually agreed upon between the Utility and the Producer to Ensure either Non-Exporting designation or Agreed-upon levels of Limited Export. The limits may be based on technical limitations of the Interconnection Customer's equipment or the Utility's Distribution System Equipment. ~~To ensure that Limited Export and Inadvertent Export levels remain within mutually agreed-upon limits, the Interconnection Customer may use an uncertified PCS, an internal transfer relay, energy management system, or other Customer facility hardware or software if approved by the Utility on a case-by-case basis at its discretion.~~

To ensure that Limited Export and Inadvertent Export levels remain within mutually agreed-upon limits, the Interconnection Customer may use an uncertified PCS, an internal transfer relay, an energy management system, or other Customer facility hardware or software where such equipment or system satisfies objective technical criteria sufficient to reliably enforce the applicable operating limit. Utility approval shall not be unreasonably withheld or delayed, and any denial shall be provided in writing with a technical explanation.

f. Where an Applicant proposes to limit Export, generation output, ESD charging, ESD discharging, V2G EV charging or discharging, or other operating characteristics through a Certified PCS, Limited Generation Profile, protective function, relay-based scheme, energy management system, or other control architecture acceptable under this Rule, the Utility shall evaluate the Generating Facility based on such enforceable limits. Such limits shall be documented in the Application and IOA and shall be subject to verification through applicable commissioning, testing, and inspection requirements.

8. Specific EV, V2G EV, Charger and Charging Station Requirements

a. The Interconnection of a V2G EV and its EVSE to the Utility's Distribution System, or conversion of an EV charger, charging station, or EVSE to V2G, shall be subject to this Rule only when the V2G EV and its EVSE shall operate in a mode where discharging will occur when Interconnected and operating in Parallel Operation with the Utility's Distribution System.

Requirements applicable to V2G EVs, EV chargers, charging stations, and EVSE shall be proportional to the resource's actual operating mode and grid interaction. A bidirectional EV, EV charger, charging station, or EVSE that is configured so that it cannot discharge while operating in Parallel Operation with the Utility's Distribution System shall not be subject to requirements applicable to Exporting Generating Facilities, except to the extent necessary to verify that such discharging cannot occur while grid-connected.

...

e. A V2G EV, EV charger, charging station, or EVSE that discharges solely for backup or Vehicle-to-Home operation after first disconnecting from the Utility's Distribution System through Break-before-Make operation shall not be required to submit a full Application under this Rule solely due to such backup or Vehicle-to-Home capability. Such resources shall be subject to Rule 19 and any applicable notification, inspection, or safety requirements necessary to confirm that discharge cannot occur while operating in Parallel Operation with the Utility's Distribution System.

9. Advanced Inverter Requirements

e. Default Settings

(2) Volt-Watt Settings

~~(a) This setting shall be enabled.~~

~~(b) Default settings shall conform to IEEE 1547-2018 Table 10.~~

(a) This setting shall only be required when there is a demonstrated system need that could be alleviated by the volt-watt setting or when an applicant voluntarily elects to enable.

12. Communication Requirements

c. Direct communications to Advanced Inverters, PCSs, energy management systems, or Master Microgrid Controllers shall be made available (i.e., unlocked, functional, and capable of being provisioned to Utility systems) at the request of the Utility for use by the Utility when communications are required to prevent an Emergency or Unsafe Operating Conditions or to enable Customer participation in voluntary programs and/or tariffs when no alternative cost-effective communication pathway (e.g., via a vendor cloud service) can be established, via:

- (1) Producer maintained wireless broadband internet and wireless communication capability of the Advanced Inverters, PCSs, energy management systems, or Master Microgrid Controllers; or
- (2) Producer maintained wired broadband internet or Utility owned field area network communicating to local Utility gateway interfaced to a local DER communication interface on Advanced Inverters PCSs, energy management systems, or Master Microgrid Controllers.

The availability of communication capability shall not, by itself, authorize the Utility to monitor, dispatch, curtail, or otherwise control a Producer's Generating Facility except as expressly provided in this Rule, the IOA, or a Commission-approved tariff or program. Any direct control capability required by the Utility shall be limited to Emergency conditions, Unsafe Operating Conditions, protection of system reliability, or participation in voluntary Commission-approved programs or tariffs. The Utility shall identify in writing the operational need for any required direct communications or control capability and shall use the least-cost, least-intrusive communication pathway that satisfies that need.

d. The operational data and control capabilities required by the Utility to ensure the safe, reliable, and tariff-compliant operation of the Distribution System, as defined in and limited to the data elements identified in IEEE 1547-2018 Clause 10, shall cost effectively be made

available by the Producer or its vendors to the Utility through the communication pathways and protocols established under this Section.

Any incremental costs for communications equipment, gateways, communication services, or ongoing connectivity required solely to meet a Utility operational need shall be identified in writing and included in the applicable IOA or other agreement. The Utility shall not require a communications pathway or control capability that is duplicative of an available lower-cost pathway capable of meeting the same operational need.

Section H — Metering, Monitoring and Telemetry

~~9. ESD Metering Equipment, including an appropriate Utility-owned, bi-directional, Interval Meter, as defined in Rule 1, shall be installed for all ESD installations per applicable published Utility manuals and standards dealing with Metering specifications.~~ ESD Metering Equipment, including an appropriate Utility-owned, bi-directional, Interval Meter, as defined in Rule 1, may be required for an ESD installation only where necessary to meet a specific operational, reliability, settlement, tariff, or program requirement and where the necessary data cannot be obtained through existing revenue-grade Metering, inverter data, PCS data, vendor platform data, or other comparable data sources. The Utility shall identify in writing the basis for requiring separate ESD Metering and shall consider less intrusive or more cost-effective alternatives before requiring separate ESD Metering.

~~a. All service switches, Meter sockets, Meter enclosures, cutouts and similar devices, irrespective of voltage, required in connection with ESD Metering shall be furnished, installed, maintained and owned by the Producer at no cost to the Utility.~~ All service switches, Meter sockets, Meter enclosures, cutouts and similar devices, irrespective of voltage, required in connection with ESD Metering shall be furnished, installed, maintained, and owned by the Producer at no cost to the Utility only where such ESD Metering is required pursuant to this Section.

~~b. The Utility shall furnish, install and own the appropriate Meter or Meters used for ESD Metering, at its cost. Such installation location shall be furnished by the Producer and approved by the Utility, and shall, at reasonable times, be accessible for reading, testing and maintaining the Meter.~~ Where ESD Metering is required pursuant to this Section, the Utility shall furnish, install, and own the appropriate Meter or Meters used for ESD Metering, at its cost. Such installation location shall be furnished by the Producer and approved by the Utility, and shall, at reasonable times, be accessible for reading, testing, and maintaining the Meter.

Section I — Facility Ownership and Cost Responsibility

§ 4. Final Accounting and Reconciliation.

Within sixty (60) calendar days after the later of (i) the Utility's issuance of Permission to Operate or (ii) completion of all Utility-owned Interconnection Facilities or Distribution System improvements required for the Interconnection, the Utility shall provide the Producer with a final accounting of actual costs incurred for studies, facility design and engineering, Interconnection Facilities, Distribution System improvements, Metering, communications, and Telemetry for which the Producer is responsible under this Rule. The final accounting shall be itemized by cost category, including, as applicable, labor, materials, equipment, engineering, overhead, contingency, and other material cost components.

If the Producer's payments exceed the actual costs for which the Producer is responsible, the Utility shall refund the overpayment within thirty (30) calendar days after issuance of the final accounting. If the actual costs for which the Producer is responsible exceed amounts previously paid, the Utility shall invoice the Producer for the difference with the final accounting, subject to any cost envelope, contingency limit, or other cost limitation established in this Rule or applicable agreement.

Section J — Facility Installation, Inspection, and Commissioning

1. Facility Installation

a. After executing the applicable agreements, the Utility and/or the Producer shall commence construction and installation of the Distribution System improvements or Interconnection Facilities that have been identified in the agreements using good faith efforts to meet schedules and fixed or estimated costs as appropriate.

Within thirty (30) business days after the Applicant executes any agreement authorizing construction of Utility-owned Interconnection Facilities or Distribution System improvements and remits any required payment, the Utility shall provide the Applicant with a written construction schedule identifying material construction milestones. The Utility shall provide written status updates to the Applicant at least every thirty (30) business days during construction and shall promptly notify the Applicant of any material change to the construction schedule, including the reason for the change and the expected effect on completion.

26. Section J — Add PTO Cure Timeline

4. Facility Certification and PTO

b. For Net Metering Systems:

(1) within ten (10) business days of receipt of both written notice from the Applicant that the installation of the Net Metering System is complete and a copy of any required final inspection clearance from the AHJ, the Utility shall either:

(a) issue PTO; or

(b) provide to the Applicant a specific written description of the deficiencies that must be corrected prior to PTO. If the Utility identifies deficiencies that must be corrected before PTO may be issued, the Utility shall identify such deficiencies in writing with sufficient detail to allow the Producer to cure them. After the Producer provides notice that the identified deficiencies have been cured, the Utility shall issue PTO or identify any remaining deficiencies within ten (10) business days.

(2) at the time the Utility issues PTO, the Utility shall provide to the Producer a copy of the fully executed IOA if it has not already done so.

c. For non-Net Metering Systems, within ten (10) business days of receipt of notice from the Producer that installation of the Generating Facility is complete the Utility shall either:

(1) issue PTO; or

(2) provide the Producer with a written list of deficiencies to be corrected. If the Utility identifies deficiencies that must be corrected before PTO may be issued, the Utility shall identify such deficiencies in writing with sufficient detail to allow the Producer to cure them. After the Producer provides notice that the identified deficiencies have been cured, the Utility shall issue PTO or identify any remaining deficiencies within ten (10) business days. Upon notice to the Utility by the Producer that all necessary corrections have been made, the parties shall use good faith efforts to schedule any required re-inspection in a timely manner.

Section K — Dispute Resolution

K — Dispute Resolution

2. Any dispute arising between the Utility and the Producer (individually “Party” and collectively “the Parties”) regarding the Utility’s performance of its obligations under its Tariff Schedules, the implementing agreements, and requirements related to the Interconnection of the Producer’s facilities pursuant to this Rule shall be resolved according to the following procedures:

~~a. The dispute shall be reduced to writing by the aggrieved Party in a letter (“the dispute letter”) to the other Party containing the relevant known facts pertaining to the dispute, the specific dispute and the relief sought, and express notice by the aggrieved Party that it is invoking the procedures under this Section.~~

~~b. Within forty-five (45) calendar days after the Utility receives the dispute letter, the Parties’ authorized representatives shall meet and confer to try to resolve the dispute.~~

~~c. If the Parties do not resolve their dispute within forty-five (45) calendar days after the date of the dispute letter, the dispute shall, upon demand of either Party, be submitted to resolution before the Commission in accordance with the procedures outlined in NAC 703.616 to 703.651.~~

a. The dispute shall be reduced to writing by the aggrieved Party through any reliable written communication method, including electronic mail or any Utility portal established for interconnection communications (“the dispute notice”). The dispute notice shall contain the relevant known facts pertaining to the dispute, the specific dispute and relief sought, and express notice by the aggrieved Party that it is invoking the procedures under this Section.

b. Within five (5) business days after receipt of the dispute notice, the receiving Party shall confer with the aggrieved Party to schedule an initial meeting between authorized representatives of the Parties. The initial meeting shall occur no later than twenty (20) business days after receipt of the dispute notice unless the Parties mutually agree to a later date.

c. The Parties shall continue to make good-faith efforts to resolve the dispute informally, including through additional meetings, exchange of reasonably necessary information, and involvement of appropriate technical and commercial personnel, as applicable. If the Parties reach an impasse or do not resolve their dispute within forty-five (45) calendar days after the date of the dispute notice, either Party may submit the dispute to the Commission for resolution in accordance with the procedures outlined in NAC 703.616 to 703.651.

...

4. The Utility shall designate an interconnection ombudsperson or other single point of contact to receive and assist in resolving informal interconnection disputes before escalation to the Commission. The ombudsperson shall be available to facilitate communication regarding application processing, study timing, study assumptions, cost communication, construction coordination, Metering, communications, and PTO processing. Use of the ombudsperson process shall not limit either Party's right to invoke the formal dispute resolution procedures in this Section or seek Commission resolution.

5. Any dispute resolved by order of the Commission shall be a final decision of the Commission ripe for judicial review.

Attachment 1 — Applicability

Revise Bidirectional EVSE / V2G Backup or Islanded Operation Row

For the row addressing:

Bidirectional EVSE or V2G EV configured for V2G operation, discharging will not occur while connected to the grid, and discharge will occur only in Islanded Microgrid or backup mode.

Replace the final column with:

Notification under Rule 15 or Rule 19, as applicable, and no full Rule 15 Application, provided the resource cannot discharge while operating in Parallel Operation with the Utility's Distribution System and discharges only in Islanded Microgrid or backup mode following Break-before-Make operation.

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Nevada that, on the date given below, she caused to be served a copy of the foregoing document upon the following person(s) via electronic mail.

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DATED this 15 May 2026, in Reno, Nevada.

/s/Amanda Sanchez

Amanda Sanchez

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