26-05007

Public Utilities Commission of Nevada

Electronic Filing

Submitted: 11/18/2026 1:34:02 PM

Reference: 340abf8c-95bc-42b4-b366-d41ce88137bc

Payment Reference: b4-b366-d41ce88137bc

Filed For: Novva Holdings LLC on behalf of its subsidiaries Novva Las Vegas LLC Nova Reno LLC and Proton NLV LLC

In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s Miriam Harris

By electronically filing the document(s),
the filer attests to the authenticity of the electronic signature(s) contained therein.

This filing has been electronically filed and deemed to be signed by an authorized agent or
representative of the signer(s) and
Novva Holdings LLC on behalf of its subsidiaries Novva Las Vegas LLC Nova Reno LLC and Proton NLV LLC

FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 11/18/2026

Davison Van Cleve PC
Attorneys at Law
(725) 735.1718 ● crl@dvclaw.com
4675 W Teco Ave., Suite 230
Las Vegas, Nevada 89118

November 18, 2026

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

Re: Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2027-2046 Triennial Integrated Resource Plan and 2027-2029 Energy Supply Plan.
Docket No. 26-05007

Dear Ms. Osborne:

Please find enclosed the Reply Legal Brief on behalf of Novva Holdings, LLC ("Novva"), for electronic filing in the above-referenced docket. This filing is being served on the parties on the official service list in this docket via electronic mail, as reflected on the enclosed certificate of service.

Please contact the undersigned with any questions regarding this filing. Thank you for your attention to this matter.

Sincerely,

/s/ Curt R. Ledford
Curt R. Ledford
Nevada Bar No. 9101
4675 W. Teco Ave., Suite 230
Las Vegas, NV 89118
(725) 735-1718
crl@dvclaw.com
Attorney for Novva Holdings, LLC

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2027-2046 Triennial Integrated Resource Plan and 2027-2029 Energy Supply Plan.	Docket No. 26-05007

REPLY LEGAL BRIEF OF NOVVA HOLDINGS, LLC

I. INTRODUCTION

Novva Holdings, LLC ("Novva") submits this Reply Brief in accordance with the briefing schedule established at the close of the Phase II hearing. NV Energy's November 12, 2026 brief is the first brief to address Novva's Reno project. The Reno project is energized and taking service under its HVD agreement and Schedule GS-3T, and Sierra may not condition that existing service on the LLESA or on a substitute agreement carrying the LLESA's minimum billing terms.

II. ARGUMENT

A. Special Condition 10 Permits Only a Contract for Service at Schedule GS-3 Rates and Terms.

NV Energy states that Novva "[c]onced[es] that it is subject to Special Condition 10" and disputes only whether the condition authorizes additional rates, a question NV Energy says the Commission "does not have to resolve."[1] Novva takes service under Schedule GS-3T, and Special Condition 10 is part of that schedule. The Commission must resolve what the condition permits because NV Energy's fallback depends on it. The condition states in full: "Utility may require a contract for service hereunder for a minimum term of not less than one year."[2] A contract "hereunder" is a contract for service at the rates and on the terms of Schedule GS-3. Staff reads the condition the same way, in that it authorizes a contract "based on the rates and conditions of

[1] NV Energy Br. at 7, November 12, 2026.
[2] Schedule No. GS-3, Special Condition 10.

Schedules GS-3 and LGS-3," and "does not grant NV Energy the authority to use contractual conditions as a mechanism to create a new tariff or rate structure."[3] Novva appreciates and supports Staff's analysis here.

NV Energy's proposed "alternative service agreement" would add "minimum demand, minimum energy, security and termination provisions" while "keeping the standard rates."[4] Those are the minimum billing terms Novva has demonstrated are rates.[5] Schedule GS-3 already defines the minimum charge for service "hereunder" as the Basic Service Charge, Additional Meter Charge, and Customer Specific Facilities Charge, if applicable.[6] A minimum demand or minimum energy charge replaces that minimum with a larger one, so it does not keep the standard rates. NV Energy itself lists these provisions among the LLESA's "core customer-protection provisions,"[7] so the fallback is the LLESA's billing structure under another name. Approval of that agreement under Rule 10 would not substitute for the process Chapter 704 requires to change a schedule.[8] NV Energy also did not invoke the condition before energizing the Reno project, and its witness was not aware of Special Condition 10 ever having been used to require an existing customer to sign a second service agreement.[9]

B. Novva's Positions Differ Because Its Agreements Differ.

NV Energy calls Novva's position inconsistent because Novva's two Las Vegas projects also have HVD agreements but signed LLESAs.[10] The difference lies in the agreements. The Reno project's HVD agreement with Sierra took effect February 14, 2023, and the project has begun taking service under the HVD agreement without requiring any other service agreement.[11] That

[3] Staff Br. at 7, November 12, 2026.
[4] NV Energy Br. at 7, November 12, 2026.
[5] Novva Opening Br. at 6-7, November 6, 2026.
[6] Schedule No. GS-3.
[7] NV Energy Br. at 3, November 12, 2026.
[8] NRS 704.066; NRS 704.100(1)(a).
[9] Phase II Tr. Vol. IV at 132:9-11 (Wells).
[10] NV Energy Br. at 7, November 12, 2026.
[11] Swenson Phase II Direct at 4-6, Q&A 11, 13, 15, September 22, 2026.

agreement provides that Novva will take service under Schedule GS-3T and states only that Novva "may be required" to enter into a service agreement.[12]

The Las Vegas agreements are with Nevada Power and were executed or restated after NV Energy began revising its HVD template in October 2024 to require separate service agreements.[13] The first Las Vegas HVD agreement was amended and restated effective April 17, 2025, and the second took effect August 18, 2025; that second project is still in development.[14] NV Energy itself presented the form LLESA as the agreement for customers "meeting a requirement specified in Novva's Rule 9 contract."[15] Even so, Novva executed each LLESA with a written statement that it did so because Nevada Power had conditioned service on execution, and it reserved its rights.[16] Novva supports a prospective large-load framework for new load under agreements that call for one, but it opposes imposing one on service NV Energy already provides under an agreement that does not.

III. CONCLUSION

For these reasons, Novva respectfully requests that the Commission grant the relief requested in its Opening Brief and further find that (1) Special Condition 10 of Schedule GS-3 permits Sierra to require only a contract for service at the rates and on the terms of that schedule; and (2) any agreement Sierra requires of the Reno project under Special Condition 10 may not include minimum demand, minimum energy, security, or termination charges that do not appear in Schedule GS-3.

[12] Swenson Phase II Direct at 6, Q&A 15, September 22, 2026.
[13] Daghlian Phase II Rebuttal at 8:11-16, October 6, 2026.
[14] Swenson Phase II Direct at 3-4, Q&A 10-11, September 22, 2026.
[15] Swenson Phase II Direct at 9, Q&A 21, September 22, 2026.
[16] Swenson Phase II Direct at 10, Q&A 24, September 22, 2026.

DATED this 18th day of November, 2026.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.
/s/ Curt R. Ledford
Curt R. Ledford, Esq.
Nevada Bar No. 9101
4625 W. Teco Ave., Suite 230
Las Vegas, NV 89118
(725) 735-1718
crl@dvclaw.com

Attorneys for Novva Holdings, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing REPLY LEGAL BRIEF ON BEHALF OF NOVVA HOLDINGS, LLC ("Novva") upon each of the parties on the attached service list in this proceeding via electronic mail.

DATED this 18th day of November 2026.

/s/ Miriam Harris
Miriam Harris
Paralegal

Staff Counsel Support
Public Utilities Commission of Nevada
Mr. Don Lomoljo, Staff Counsel
1150 E. William Street
Carson City, Nevada 89701-3109
dlomoljo@puc.nv.gov
pucn.sc@pucn.nv.gov

Office of the Attorney
General Bureau of Consumer Protection
Michelle Badorine
100 North Carson Street
Carson City, Nevada 89701
bcp@ag.nv.gov
mbadorine@ag.nv.gov

Nevada State Clearinghouse
Skip Canfield
901 S Stewart St Ste 5003
Carson City, NV 89701
nevadaclearinghouse@lands.nv.gov

General Bureau of Consumer Protection
Michael Saunders
8945 W Russell Rd Ste 204
Las Vegas, NV 89148
msaunders@ag.nv.gov

Advanced Energy United
Brian Turner
Emma Hibbard
1801 Pennsylvania Ave NW Ste 410
Washington, DC 20006
bturner@advancedenergyunited.org
ehibbard@advancedenergyunited.org

Amazon
Aisling Scott
Brittany Iles
2121 8th Ave
Seattle, WA 98121
aiscot@amazon.com
beiles@amazon.com

NV Energy Regulatory Dept
NV Energy
6100 Neil Rd
Reno, NV 89511
regulatory@nvenergy.com

Keyes & Fox LLP
Scott Dunbar
1580 Lincoln St Ste 1105
Denver, CO 80203
sdunbar@keyesfox.com

Holland & Hart LLP
Amanda Sanchez
Kristine Roach
Laura Granier
Lucas Foletta
5470 Kietzke Ln Ste 100
Reno, NV 89511
alsanchez@hollandhart.com
karoach@hollandhart.com
lkgranier@hollandhart.com
lmfoletta@hollandhart.com

Caesars Enterprise Services LLC
Jeffery Ruskowitz
One Caesars Palace Dr
Las Vegas, NV 89109
jruskowitz@caesars.com

McDermott Will & Schulte LLP
Hafsa Tout
Hallie Fox
Joseph McClure
444 W Lake St Ste 4000
Chicago, IL 60606
htout@mcdermottlaw.com
hfox@mcdermottlaw.com
jmcclure@mcdermottlaw.com

Colovore LLC
Mike Fulkerson
1101 Space Park Dr
Santa Clara, CA 95054
fulkerson@colovore.com

PR RNO Property Owner 1, LLC
SV RNO Property Owner 1, LLC
3200 Cherry Creek S Dr., Ste 700
Denver, CO 80209
Attn: Shalini Sharma
Shalini.sharma@fleetdatacenters.com

Interwest Energy Alliance
Hunter Holman
400 Gold Ave SW Ste 700
Albuquerque, NM 87102
hunter@interwest.org

Davis Wright Tremaine LLP
Anna Fero
Chasity Hendren
Vidhya Prabhakaran
50 California St 23rd FL
San Francisco, CA 94111
annafero@dwt.com
chasityhendren@dwt.com
sfopuncdocket@dwt.com
vidhyaprabhakaran@dwt.com

Davison Van Cleve PC
Curt Ledford
Dakota Councilman
4675 W Teco Ave Ste 230
Las Vegas, NV 89118
crl@dvclaw.com
dlc@dvclaw.com

Parsons Behle & Latimer
Justina Caviglia
Shawna Blank
50 W Liberty St Ste 750
Reno, NV 89501
jcaviglia@parsonsbehle.com
sblank@parsonsbehle.com

Bates White LLC
Carolyn Berry
2001 K St NW North BLDG Ste 500
Washington, DC 20006
carolyn.berry@bateswhite.com

Google LLC
Sydney Henry
12396 Grant St
Thornton, CO 80241
sydneyhenry@google.com

Interwest Energy Alliance
Nina Peluso
PO Box 587
Hinesburg, VT 05461
npeluso@energyfuturesgroup.com

MGM Resorts International
Henry Shields
3260 Sammie Davis Jr Dr BLD A
Las Vegas, NV 89109
hshields@mgmresorts.com

Pepple Moser PC
Anna Congdon
Tyler Pepple
1500 SW First Ave Ste 980
Portland, OR 97201
anna@pepplemoser.com
tyler@pepplemoser.com

Nevada Resort Association
Virginia Valentine
10000 W Charleston Blvd Ste 165
Las Vegas, NV 89135
valentine@nevadaresorts.org

Womble Bond Dickerson LLP
Lucy Crow
One E Liberty St Ste 300
Reno, NV 89501
lucy.crow@wbd-us.com

Womble Bond Dickerson (US) LLP
Dietrich Hoefner
Michelle Gaeng
1601 19th St Ste 100
Denver, CO 80202
dietrich.hoefner@wbd-us.com
michelle.gaeng@wbd-us.com

Arnold & Porter Kaye Scholer LLP
Randall Miller
1144 15th St Ste 3100
Denver, CO 80202
randy.miller@arnoldporter.com

Keyes & Fox
Scott Dunbar
1580 Lincoln St Ste 1105
Denver, CO 80203
sdunbar@keyesfox.com

Sklar Williams PLLC
Ann Pongracz
410 S Rampart Blvd Ste 350
Las Vegas, NV 89145
apongracz@sklar-law.com

Nevada Gold Mines LLC
Hiliary Wilson
1655 Mountain City Hwy
Elko, NV 89801
hiliary.wilson@barrick.com

Nevada Workers For Clean and AFF
Hunter Stern
30 Orange Tree Cir
Vacaville, CA 95687
hls5@ibew1245.com

Arnold & Porter Kaye Scholer LLP
David Jelsma
1144 15th St Ste 3100
Denver, CO 80202
david.jelsma@arnoldporter.com

Reese Ring Velto PLLC
Monique Rodriguez
Nathan Ring
3100 W Charleston Blvd Ste 208
Las Vegas, NV 89102
monique@rrvlawyers.com
nathan@rrvlawyers.com

Redwood Materials INC
Alma Chao
Josh Gubkin
2801 Lockheed Way
Reno, NV 89706
alma@redwoodmaterials.com
joshgubkin@redwoodmaterials.com

Solar United Neighbors
Shannon Anderson
1350 Connecticut Ave NW Ste 412
Washington, DC 20036
sanderson@solarunitedneighbors.org

Western Resource Advocates
George Cavros
Jeff Griffin
Zoe Harrold
Nicolas Oliver
275 Hill St Ste 210
Reno, NV 89501
george.cavros@westernresources.org
jeff.griffin@westernresources.org
nicolas.oliver@westernresources.org
zoe.harrold@westernresources.org

Solar Energy Industries Association
Kevin Lucas
Wil Gehl
1425 K St NW Ste 1000
Washington, DC 20005
klucas@seia.org
wgehl@seia.org

Tahoe Spark
Danielle Hughes
PO Box 144
Carnelian Bay, CA 96140
jointahoespark@gmail.com

Earth Justice
David Bender
3916 Nakoma Rd
Madison, WI 53711
dbender@earthjustice.org

Powerline Law
Robert Sweetin
4775 W Teco Ave Ste 205
Las Vegas, NV 89118
bob@powerline.law

Sierra Club
Joseph Halso
Maddie Lipscomb
Patrick Woolsey
2101 Webster St Ste 1300
Oakland, CA 94612
joe.halso@sierraclub.org
maddie.lipscomb@sierraclub.org
patrick.woolsey@sierraclub.org

Southwest Energy Efficiency Project
Courtney Fieldman
Travis Madsen
2334 Broadway Ste A
Boulder, CO 80304
cfieldman@swenergy.org
tmadsen@swenergy.org

Vote Solar
Brad Heusinkveld
Christopher Mixson
4111 W Kootenai St
Boise, ID 83705
bheusinkveld@votesolar.org

Walmart Inc
Jamie McGovern
814 Respect Dr
Bentonville, AR 72716
jamie.mcgovern@walmart.com

Reno Power NR 1, LLC
3200 E Cherry Creek Dr., Suite 700
Denver, CO 80206
Attn: Molly Watters
molly.watters@tractcapital.com