26-05007

Public Utilities Commission of Nevada
Electronic Filing
Submitted: 11/18/2026 11:37:18 AM

Reference: 3e01dbc4-f255-4d76-94c8-5186008dcd73

Payment Reference: 76-94c8-5186008dcd73

Filed For: Walmart Inc

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

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
Walmart Inc

PARSONS BEHLE & LATIMER
Justina A. Caviglia
Nevada Bar No. 9999
50 West Liberty Street, Suite 750
Reno, Nevada 89501
Telephone: 775.323.1601
Facsimile: 775.348.7250
JCaviglia@parsonsbehle.com

Attorney for Walmart Inc.

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 2027-2029 Integrated Resource Plan, 2027-2029 Action Plan and 2027-2029 Energy Supply Plan	Docket No. 26-05007

REPLY BRIEF OF WALMART, INC.

Walmart Inc. ("Walmart") submits this Reply Brief in response to the November 12, 2026, responsive brief filed by Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy (collectively, "NV Energy").

A. NV ENERGY HAS NOT JUSTIFIED THE 25 MW THRESHOLD

NV Energy responds that the 25 MW threshold was proposed "because loads of this size can cause incremental costs that, without the Large Load Energy Supply Agreement's ("LLESA") protections, could be shifted to other customers," and that "the cost-shifting risks that are the purpose of the LLESA are not limited to load that exceeds Walmart's proposed 75 MW threshold."[1] This response restates the conclusion; it does not supply the missing evidence.

First, NV Energy cites only a single answer in Ms. Wells' direct testimony for their position. They point to no analysis showing what new resource commitments a 25 MW customer actually causes, and they do not address the distinction Walmart drew. A longstanding distribution center's

[1] NV Energy's November 12, 2026, Reply Brief ("Reply Brief") at 7.

current 25+ MW demand and high load factor do not by themselves establish that it caused the same new resource commitments as a speculative, rapidly ramping data center project. Historical load, gradual growth, utility planning history, and existing cost recovery are the relevant evidence for setting the threshold, and the NV Energy presented none of it.

Second, NV Energy's argument that a load "can" cause incremental costs proves too much. Any load, of any size, can cause incremental costs. The question is which customers present the distinct, rapidly ramping, and potentially stranded resource commitments that justify LLESA-type protections such as security, minimum bills, and termination liability. Treating established general-service businesses as if they posed the same risk as speculative data center projects would sweep in customers whose costs are already reflected in planning and existing rates, contrary to the principle that distinctions for very large loads should not inherently alter general business customers status.

Third, Walmart is not alone in questioning the threshold. The Regulatory Operation Staff ("Staff") characterized NV Energy's request as seeking rules of general applicability for loads "above a subjective threshold."[2] NV Energy itself emphasizes that the Commission, not NV Energy, ultimately determines LLESA applicability.[3] The Commission should exercise that authority on evidence. It should set the qualifying threshold at 75 MW, either in the large load tariff or in any LLESA form it approves, or, at a minimum, direct NV Energy to support any lower threshold with objective qualifying-load criteria in the tariff proceeding.

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

---

[2] Staff's November 12, 2026, Responsive Brief at 9.

[3] NV Energy Reply Brief at 7.

B. CONCLUSION

For the reasons stated above and in Walmart's Opening Brief, Walmart respectfully requests that the Commission set the qualifying threshold at 75 MW, or require NV Energy to justify any lower threshold with objective evidence in the tariff proceeding.

DATED this 18th day of November, 2026.

PARSONS BEHLE & LATIMER

/s/ Justina A. Caviglia

Justina A. Caviglia
Nevada Bar No. 9999
50 West Liberty Street, Suite 750
Reno, Nevada 89501
Telephone: 775.323.1601
jcaviglia@parsonsbehle.com

Attorney for Walmart Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2026, I caused a true and correct copy of the foregoing document, **REPLY BRIEF OF WALMART, INC.**, to be served via e-mail to the following:

Roman Borisov
Trevor Dillard
NV Energy
Roman.Borisov@nvenergy.com
regulatory@nvenergy.com

Don Lomoljo
Public Utilities Commission of Nevada
dlomoljo@puc.nv.gov
pucn.sc@puc.nv.gov

Michelle Badorine
Michael Saunders
Bureau of Consumer Protection
mbadorine@ag.nv.gov
msaunders@ag.nv.gov
bcpserve@ag.nv.gov

Kirsten Stasio
Nevada Clean Energy
kirsten@nevadacef.org

Patrick Woolsey
Maddie Lipscomb
Sierra Club
patrick.woolsey@sierraclub.org
maddie.lipscomb@sierraclub.org

Brian Turner
Emma Hibbard
Advanced Energy United
bturner@advancedenergyunited.org
ehibbard@advancedenergyunited.org

Scott Dunbar
Keyes & Fox LLP
sdunbar@keyesfox.com

Aisling Scott
Brittany Iles
Amazon
aiscot@amazon.com
beiles@amazon.com

Lucas Foletta
Amanda Sanchez
Kristine Roach
Laura Granier
Holland & Hart LLP
lmfoletta@hollandhart.com
alsanchez@hollandhart.com
karoach@hollandhart.com
lkgranier@hollandhart.com

Mike Fulkerson
Colovore LLC
fulkerson@colovore.com

Anna Fero
Chasity Hendren
Vidhya Prabhakaran
Davis Wright Tremaine LLP
annafero@dwt.com
chasityhendren@dwt.com
vidhyaprabhakaran@dwt.com

Curt Ledford
Dakota Councilman
Davison Van Cleve PC
crl@dvclaw.com
dlc@dvclaw.com

Shalini Sharma
Fleet Data Centers
Shalini.sharma@fleetdatacenters.com

Jeffrey Ruskowitz
Caesars Enterprise Services LLC
jruskowitz@caesars.com

Carolyn Berry
Bates White LLC
carolyn.berry@bateswhite.com

Sydney Henry
Google LLC
sydneyhenry@google.com

Hunter Holman
Nina Peluso
Interwest Energy Alliance
hunter@interwest.org
npeluso@energyfuturesgroup.com

Henry Shields
MGM Resorts International
hshields@mgmresorts.com

Ann Pongracz
Sklar Williams PLLC
apongracz@sklar-law.com

Anna Congdon
Tyler Pepple
Pepple Moser PC
anna@pepplemoser.com
tyler@pepplemoser.com

Hiliary Wilson
Nevada Gold Mines LLC
hiliary.wilson@barrick.com

Virginia Valentine
Nevada Resort Association
valentine@nevadaresorts.org

Hunter Stern
Nevada Workers for Clean and AFF
hls5@ibew1245.com

Lucy Crow
Dietrich C. Hoefner
Michelle A. Gaeng
Womble Bond Dickinson LLP
lucy.crow@wbd-us.com
dietrich.hoefner@wbd.us.com
michelle.gaeng@wbd-us.com

Alma Chao
Josh Gubkin
Ian Mensher
Redwood Materials, Inc.
alma@redwoodmaterials.com
joshgubkin@redwoodmaterials.com
ian.mensher@redwoodmaterials.com

Molly Watters
Tract Management Co
molly.watters@tractcapital.com

Kevin Lucas
Wil Gehl
Solar Energy Industries Association
klucas@seia.org
wgehl@seia.org

Shannon Anderson
Solar United Neighbors
sanderson@solarunitedneighbors.org

Courtney Feldman
Sweep
cfieldman@swenergy.org

Travis Madsen
Southwest Energy Efficient Project
tmadsen@swenergy.org

Danielle Hughes
Tahoe Spark
jointahoespark@gmail.com

Brad Heusinkveld
Vote Solar
bheusinkveld@votesolar.org

Monique Rodriguez
Nathan Ring
Reese Ring Velto PLLC
monique@rrvlawyers.com
nathan@rrvlawyers.com

Robert Sweetin
Powerline Law
bob@powerline.law

George Cavros
Jeff Griffin
Nicolas Oliver
Zoe Harrold
Western Resource Advocates
george.cavros@westernresources.org
jeff.griffin@westernresources.org
Nicolas.oliver@westernresources.org
Zoe.harrold@westernresources.org

Julia Hubbard
Solar United Neighbors
jhubbard@solarunitedneighbors.org

Rachel McMahon
EDF Power Solutions
Rachel.mcmahon@edf-re.com

Randall H. Miller
David S. Jelsma
Arnold & Porter Kaye Scholer LLP
randy.miller@arnoldporter.com
david.jelsma@arnoldporter.com

David Bender
Earth Justice
dbender@earthjustice.org

Jaime McGovern
Walmart Inc.
jaime.mcgovern@walmart.com

Joseph McClure
Hafsa Tout
Hallie Fox
McDermott Will & Schulte LLP
jmcclure@mcdermottlaw.com
htout@mcdermottlaw.com
hfox@mcdermottlaw.com

Danyale Howard
Qualus LLC
Danyale.howard@qualuscorp.com

Terry Page
Terry Page Consulting
Terrypage0@me.com

Lisa Tormoen Hickey
Tormoen Hickey LLC
lisahickey@newlawgroup.com

/s/ Shawna Blank
Employee of Parsons Behle & Latimer