26-06033

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BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Nevada Power Company d/b/a NV Energy
Sierra Pacific Power Company d/b/a NV Energy

Joint Expanded Solar Access Program Implementation Plan Filing
Docket No. 26-06033

Prepared Rebuttal Testimony of

Jared Bilberry

1. Q. PLEASE STATE YOUR NAME, OCCUPATION, BUSINESS ADDRESS AND PARTY FOR WHOM YOU ARE FILING TESTIMONY.

A. My name is Jared Bilberry. My current position is Program Development Director for Nevada Power Company d/b/a NV Energy ("Nevada Power") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra" and, together with Nevada Power, the "Companies" or "NV Energy"). My business address is 6226 W. Sahara Ave., Las Vegas, NV 89146. I am filing testimony on behalf of the Companies.

2. Q. DID YOU PREVIOUSLY SUBMIT TESTIMONY IN THIS PROCEEDING?

A. Yes, I filed prepared direct testimony in this docket on June 30, 2026. My qualifications were described in Q&A 2 and in **Exhibit Bilberry-Direct-1** of my direct testimony.

3. Q. WHAT IS THE PURPOSE OF YOUR PREPARED REBUTTAL TESTIMONY?

A. The purpose of my prepared rebuttal testimony is to respond to recommendations by the Regulatory Operations Staff ("Staff") of the Public Utilities Commission of Nevada ("Commission").

4. Q. WHAT EXHIBITS AND APPENDICES ARE YOU SPONSORING?

A. I am not sponsoring any exhibits or appendices on rebuttal.

5. Q. STAFF RECOMMENDS A REDUCTION IN THE REQUESTED ANNUAL BUDGET FOR THE EXPANDED SOLAR ACCESS PROGRAM ("ESAP"). DO YOU AGREE?

A. Partially. Staff recommends limiting the annual ESAP budget to approximately $530,000, consisting of the proposed Marketing & Outreach and Application Processing categories.[1] The Companies generally agree with Staff's recommendation regarding the proposed $320,000 annual Marketing & Outreach budget and agree that Marketing & Outreach and Application Processing represent the primary cost categories necessary to support administration of the 2027-2029 ESAP Plan. The primary area of disagreement relates to the level of funding necessary to support Application Processing under a year-round enrollment structure. The Application Processing analysis presented in Staff's testimony relies heavily on historical program experience that is not directly comparable to either the current 2026 transition program year or the structure of ESAP beginning in 2027. Notably, the 2026 Program Year also included both Spring and Fall enrollment periods, reflecting an expanded enrollment structure and providing a more representative transition-year benchmark than the historical application volumes cited in Staff's testimony.

[1] Docket No. 26-06033, Direct Testimony of Sherrie Alvernaz at 2-7, Q&As 5-13.

6. Q. WHAT CONCERNS DO YOU HAVE REGARDING THE ASSUMPTIONS THAT STAFF'S RECOMMENDATION IS BASED ON?

A. Staff's testimony references approximately 8,790 applications processed during the 2025 Program Year and questions the Companies' estimate of approximately 20,250 annual applications moving forward.[2] However, current participation levels already demonstrate a substantial increase in program activity. As of October 2026, the Companies have received more than 12,000 applications and have determined more than 8,000 customers eligible for participation. Application activity during the 2026 Program Year included approximately 4,462 applications during the Spring enrollment period and approximately 7,794 applications during the Fall enrollment period, resulting in approximately 12,256 applications processed during two enrollment periods. This represents approximately a 39 percent increase over the 8,790 applications processed during the 2025 Program Year and demonstrates that application-processing requirements are increasing before implementation of year-round enrollment. The 2026 Program Year therefore serves as a more representative benchmark for forecasting future application-processing requirements than the historical application volumes relied upon in Staff's testimony.

The historical budget utilization cited in Staff's testimony must also be considered in the context of how the program operated. Under prior ESAP implementation plans, enrollment occurred during limited enrollment windows, with each enrollment period typically requiring approximately two to three months of concentrated processing activity. In 2026, the Companies conducted both Spring

[2] *Id.* at 6, Q&A 11.

and Fall enrollment periods, resulting in approximately four months of total enrollment-related processing activity. During 2026, the Companies incurred approximately $57,138 in application-processing support costs. Those expenditures supported only the Spring and Fall enrollment periods rather than a full 12-month operating cycle. When annualized, the current level of processing support equates to approximately $171,000 in annual processing costs before consideration of increased application volumes, continuous customer support requirements, eligibility reviews, document verification activities, or rolling recertification requirements associated with the 2027 program structure. Notably, the current processing support costs were incurred while supporting approximately 12,256 applications during approximately four months of combined enrollment activity. Applied across a twelve-month enrollment structure, this level of activity would equate to more than 36,000 annual applications. Using the same application-processing assumptions included in the Companies' proposed budget, that level of participation would result in approximately $288,000 in annual application-processing costs. This demonstrates that the Companies' original forecast of 20,250 annual applications, which was developed prior to completion of the Fall 2026 enrollment period, may be conservative when compared to actual participation levels observed during the 2026 transition year. Accordingly, the historical budget underutilization cited in Staff's testimony appears largely attributable to the limited duration of prior enrollment periods and the fact that application-processing resources were only required during discrete enrollment windows, rather than evidence that future application-processing requirements are overstated.

7. Q. HOW WILL THE ESAP BE DIFFERENT GOING FORWARD?

A. Beginning in 2027, the ESAP transitions to a fundamentally different operating structure. Enrollment will remain open throughout the year, recertifications will occur on a rolling basis, and customer eligibility verification, document review, enrollment updates, and participant support activities will occur continuously rather than during discrete enrollment windows. As a result, application-processing resources will be required throughout the entire year rather than for two to three months of concentrated enrollment activity.

The Companies acknowledge that future operating experience may support refinement of application-processing assumptions, including distinctions between new applications and recertifications. However, the historical application volumes and budget utilization figures relied upon in Staff's testimony are not directly comparable to a year-round enrollment structure. While the Companies are willing to focus cost recovery on Marketing & Outreach and Application Processing, the transition to continuous enrollment, combined with participation levels already observed during the 2026 transition year, supports an Application Processing budget that exceeds historical funding levels and is greater than the amount implied by Staff's reliance on 2025 enrollment-period experience alone. Accordingly, while the Companies generally agree with Staff's proposed Marketing & Outreach budget, the Companies believe additional funding above the recommended $530,000 annual budget is necessary to adequately support Application Processing requirements under the 2027-2029 ESAP structure.

6. Q. GIVEN THE CHANGES TO THE ESAP PROGRAM, DO THE COMPANIES BELIEVE ANY REDUCTION IN THE ANNUAL BUDGET PROPOSED IN THEIR APPLICATION BE APPROPRIATE?

A. Yes. While the Companies believe that the $530,000 annual budget proposed by Staff is inadequate due to the fundamental changes to the ESAP enacted by the Nevada Legislature in Assembly Bill ("AB") 458 in 2025, they have reviewed Staff's proposed budget changes based and have determined that the essential administrative functions described above can be performed with an annual budget of $608,000. Of course, it is important to recognize that the Companies are proposing a budget that they believe reflects the costs of implementing a substantially different ESAP plan than has been implemented in the past, as required by the statutory changes to NRS § 704.7865.

7. Q. STAFF RECOMMENDS THAT THE COMPANIES BE REQUIRED TO INCLUDE COMMUNITY BASED SOLAR RESOURCES ("CBSRs") IN THE WEIGHTED AVERAGE COST OF ENERGY USING A ZERO COST OF ENERGY FOR THE RESOURCES.[3] DO YOU AGREE?

A. Yes. The Companies have evaluated Staff's recommendation and agree that the weighted average cost of energy can be calculated using a zero cost of energy for CBSRs.

[3] *Id.* at 8-11, Q&As 16-20.

8. Q. STAFF RECOMMENDS THAT THE COMPANIES' PRAYER FOR RELIEF NUMBER 5 BE DENIED OR THAT THE COMPANIES BE REQUIRED TO FILE AN ERRATA REVISING THAT PRAYER FOR RELIEF.[4] DO YOU AGREE?

A. While I am not an attorney, the Companies do not agree that there is an error in Prayer for Relief Number 5 in their Application. The Commission has the authority to grant the relief requested in the Application, and can give appropriate weight to the prayers for relief in its order.

9. Q. STAFF RECOMMENDS THAT THE COMMISSION FIND THAT THE COMPANIES CANNOT REQUEST APPROVAL OF ANY ADDITIONAL CBSRs UNTIL THE DRAFT REGULATIONS PENDING IN DOCKET NO. 26-07004 HAVE BEEN APPROVED BY THE COMMISSION.[5] DO YOU AGREE?

A. Yes. The Companies recognize that statutory changes enacted by the Nevada Legislature in AB 458 have a material impact on CBSR selection and approval and they have actively participated in the rulemaking in Docket No. 25-07004. Given the material changes to the CBSR approval process in both AB 458 and the draft regulations, the Companies will not seek approval of any additional CBSRs until the draft regulations have been approved by the Commission. Any CBSRs brought forward in a future filing will comply with the provisions of the Commission-approved regulations.

[4] Docket No. 26-06033, Direct Testimony of Karen Olesky at 2, Q&As 5-7.
[5] *Id.* at 3-5, Q&As 8-13.

10. Q. STAFF RECOMMENDS THAT THE REQUIREMENT THAT AN APPLICANT HAVE A MINIMUM OF EIGHT MONTHS CONSUMPTION HISTORY TO QUALIFY TO PARTICIPATE IN ESAP BE LIFTED.[6] DO YOU HAVE ANY CONCERNS WITH THIS RECOMMENDATION?

A. Not if the Companies have the ability to implement the requirement in the event that the total amount of capacity approaches the statutory limits for the ESAP. AB 458 expanded the total amount of capacity for the ESAP significantly for both Nevada Power and Sierra, but participation must be capped at 240,000 MWh and 160,000 MWh, respectively. Because Staff's recommendation acknowledges those caps and recognizes the need to reinstate this requirement when either company reaches 85 percent of the statutory cap, the Companies believe this recommendation is a reasonable way to address Staff's concern.

11. Q. STAFF HAS IDENTIFIED A POTENTIAL INCONSISTENCY IN THE WAY AN ESAP APPLICANT CAN DEMONSTATE ELIGIBILITY.[7] DO YOU HAVE ANY CONCERNS WITH STAFF'S RECOMMENDATION TO CLARIFY THE ESAP APPLICATION?

A. No. The Companies agree that an ESAP applicant can demonstrate eligibility through two alternative ways: 1) by providing documentation that they receive one of 10 specific programs; or 2) by providing "documentation from any other state, county, or local governmental or nonprofit organization that can demonstrate the applicant has an income of not more than 80 percent of the area median income based on the guidelines published by the Department of Housing and Urban Development."[8]

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[6] *Id.* at 5-7, Q&As 14-19.
[7] *Id.* at 8-9, Q&As 20-23.
[8] Docket No. 26-06033, Joint Expanded Solar Access Program Plan 2027 Implementation at 7.

The Companies included a copy of the Low-Income Application Form as Appendix B to their Application.[9] The application states that income eligibility can be established by providing "current documentation of one of the following," and lists the eleven forms of documentation that are also identified in the plan. While the Companies believe that the application is clear, they do not object to working with Staff to clarify any ambiguities that Staff believes are a concern.

12. Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

[9] *Id.* at Appendix B.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing filing of **NEVADA POWER COMPANY D/B/A NV ENERGY and SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY** in Docket No. 26-06033 upon the persons listed below by electronic email:

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DATED this 12th day of November, 2026.

/s/ Caitlin Katzenbach
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Paralegal
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