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Public Utilities Commission of Nevada

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Filed For: Petitioner Self Represented

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

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
Petitioner Self Represented

DRAFT NOTICE OF PETITION FOR INVESTIGATION AND PROSPECTIVE RELIEF CONCERNING NEVADA POWER'S RESIDENTIAL DAILY DEMAND CHARGE

Submitted under NAC 703.162 with the petition

Title of requested relief

Petition for Investigation and Prospective Relief for Residential Solar Customers Request for expedited proceedings and hearings or a continued stay on implementation of Daily Demand

Petitioner

Jay P. Raman
333 Corsicana St, Las Vegas, NV 89138
702-332-9682 | ramanj1@gmail.com

Purpose and effect on consumers

Jay P. Raman requests an independent investigation into Nevada Power Company d/b/a NV Energy's residential daily demand charge, with particular attention to solar customers, including households that charge electric vehicles at home. The petition asks the Commission to examine projected bill increases, public explanations, the accuracy and assumptions of the daily demand comparison tool, the effect of overlapping vehicle charging and summer air conditioning, and alternatives to mandatory daily demand pricing.

The petition requests expedited consideration, a consumer session, and an evidentiary hearing. It seeks consideration of lawful interim protections before January 1, 2027 and prospective modification, replacement, or discontinuation of the charge if supported by the evidence and applicable law. Potential relief could change how residential costs are collected and how those costs are allocated among solar and non-solar customers. No particular replacement rate is proposed for approval without further proceedings.

Consumer session

This consumer-initiated petition does not trigger the mandatory consumer-session requirements of NRS 704.069(1). Petitioner nevertheless requests a consumer session under NAC 703.164(1) so affected customers may describe their projected burdens and experiences with the tool. The session should supplement, not replace, the requested evidentiary hearing.

Tariff identification

This is a petition for investigation, not a tariff-sheet filing. It concerns Nevada Power's residential daily demand rate design approved in related Docket Nos. 25-02016 and 25-03006, including its application to RES-NMR-405 Tranche 4 customers. Docket No. _____.

Certificate of service

I certify that on November 6, 2026 I served a true and correct copy of this revised petition, declaration, Exhibits A through I, and draft notice on the recipients listed below by the methods stated. Any additional persons required by the applicable service list are identified on an attached continuation.

Nevada Power Company d/b/a NV Energy

Roman Borisov, Senior Attorney
roman.borisov@nvenergy.com
Method of service: e-mail

Public Utilities Commission Regulatory Operations Staff

Donald Lomoljo, Staff Counsel
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Method of service: e-mail

Nevada Attorney General Bureau of Consumer Protection

Michelle C. Badorine, Senior Deputy Attorney General
mbadorine@ag.nv.gov
Method of service: e-mail

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed on November 6, 2026

Signature: 
JAY P. RAMAN

JAY P. RAMAN
333 Corsicana St
Las Vegas, NV 89138
702-332-9682 | ramanj1@gmail.com
Petitioner appearing on my own behalf

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

In the matter of the petition of Jay P. Raman for an investigation into Nevada Power Company's residential daily demand charge and its effects on residential solar customers.

Docket No. _____

Related Docket Nos. 25-02016 and 25-03006

Petition for Investigation and Prospective Relief for Residential Solar Customers Request for expedited proceedings and hearings or a continued stay on implementation of Daily Demand

I ask the Commission to open an independent investigation into the financial burden that Nevada Power Company d/b/a NV Energy's mandatory daily demand charge will place on residential solar customers. I also ask the Commission to consider protective action before the announced January 1, 2027 implementation date and, after hearing, to modify, delay or replace the charge if the evidence warrants it.

NV Energy's own Daily Demand Tool projects that my annual bill will rise from $788.00 to $1,091.00 - a 38.45 percent increase. Other customers have reported substantial increases and question why the calculator's starting figures exceed their actual bills. Meanwhile, the public is being told that the change is not a new cost and that solar customers may see only a modest increase. These statements need to be reconciled with the numbers customers are receiving, as they don't add up.

My concern is that the Commission approved this rate design without an adequate account of how severely it would affect solar households. The current disclosures and newly enacted "Daily Demand Rate Tool" provide a concrete reason to test that concern. The Commission should determine whether the original presentation understated the burden,

whether the calculator is reliable, and whether a less burdensome approach would fairly recover the relevant costs.

1. The proceeding I am requesting

This is a general petition under NAC 703.540, submitted in accordance with NAC 703.560 and accompanied by a draft notice under NAC 703.162. I request that the Commission exercise its authority under NRS 704.120(5) to investigate rates and practices on its own motion and, after a full discovery and a hearing, make appropriate changes. I seek prospective relief under NRS 704.120 and 704.130.

I appear for myself and seek relief that would protect similarly affected solar customers. I request participation by the Bureau of Consumer Protection and Regulatory Operations Staff. I do not purport to represent other customers. The Attorney General's pending lawsuit and appeal to the Nevada Supreme Court challenges the legality of the Commission's prior approval. This petition asks the Commission to investigate whether current bill projections and public disclosures are accurate, whether the resulting burdens on affected households are reasonable, and whether a simpler, less burdensome rate structure could fairly recover the same legitimate costs. They are legally distinct issues.

If despite the different nature of the petition to the litigation you determine as a whole that pending judicial proceedings limit particular relief, I ask the Commission to identify that limitation and address the investigative and prospective relief still available to it. That said, this a different enough issue to warrant investigation now that we are at the precipice of implementation, and direct the PUCN based upon findings and facts determine the least financially burdensome method for recovering grid costs should take place.

2. The Commission's responsibility to protect ratepayers

Nevada law requires utility charges to be just and reasonable and makes unjust and unreasonable charges unlawful. NRS 704.040(1)–(2). That protection applies to the charges customers must pay, including the way costs are assigned through a rate structure. Revenue

neutrality for the utility does not, by itself, establish that the resulting charges to solar customers are reasonable.

The Commission has continuing authority to address these concerns. After investigation and hearing, NRS 704.120(1)–(2) authorizes it to replace unjust, unreasonable, or unjustly discriminatory rates, measurements, and practices. Subsection (5) permits an investigation on the Commission's own motion at any time. I ask the Commission to use that authority to examine the projected burdens and inconsistent explanations identified here, and to order prospective corrections if warranted.

The Nevada Supreme Court has also emphasized the Commission's role in protecting ratepayers from imprudently incurred expenses. In *Southwest Gas Corp. v. Public Utilities Commission of Nevada*, 138 Nev., Adv. Op. 5, 504 P.3d 503 (2022), the Court rejected a presumption that utility expenses were prudent and explained that the utility possesses the records needed to justify them. That case concerned expense recovery, not daily-demand pricing, but its reasoning supports requiring NV Energy to produce the cost records and analysis needed to evaluate its claimed justification.

The PUCN's stated mission reinforces this responsibility: protecting the public interest through fair and reasonable utility rates and regulation that benefits all Nevadans. See Nevada Legislative Auditor, PUCN Performance Measures, Report LA24-09 (September 10, 2024), Audit Highlights. I recognize that the Commission must also consider the utility's legitimate costs and financial needs. I ask it to determine, on a reliable record, whether this mandatory structure fairly allocates those costs and whether customers are receiving accurate information about what they will pay.

3. My account shows a substantial projected increase

I am a Las Vegas residential customer on RES-NMR-405 Tranche 4. My solar system was installed in December 2024 / January 2025. On November 1, 2026, I accessed the account comparison reproduced in Exhibit A. It allegedly uses September 2025 through August 2026 billing data, and displays billing of $788.00 under Current Plan, $1,091.00 under Daily Demand, and an estimated annual difference of $303.00. That equals 38.45 percent, or $25.25

more per month on average. Extrapolating out ten years; this "Daily Demand Rate" change – which is mandatory rather than optional, will cost my family $3,030.00 – not counting any other rate increases the utility makes in that timespan.

These are projected charges, not amounts already collected. I have not verified the underlying calculations and don't have the necessary data to begin to verify the calculations as it's not available to the average consumer. Nevertheless, an increase of this size deserves a specific explanation of the costs it is intended to recover and why that burden is reasonable on the few versus the many. I should not have to guess which credits, rates, or billing assumptions were used as transparency should be required. Additionally, I presume that when NV Energy does supply said data, it will be so confusing and complicated that its hard to justify Daily Demand Rate billing is less costly or less complicated than simply adding a flat fee.

4. The public explanations do not give a consistent picture

Consistency and clarity are lacking in the official materials that have been provided to the consumer on this issue – and that is highly irregular and problematic. NV Energy's average-bill illustration shows a solar customer moving from $56.00 to $69.00 per month. That is a 23.21 percent increase, or $156.00 annually. Exhibit B. The June 2026 fact sheet describes solar increases as "modest" while emphasizing little overall change for most customers. Exhibit D. The current website also states that daily demand is not a new cost or rate increase and that its solar comparison excludes carryover excess-energy credits. Exhibit H.

My result need not equal a class average. Nor does an individual increase disprove revenue neutrality for the utility. But revenue neutrality does not mean affordability for the customer whose bill rises. A presentation centered on unchanged utility revenue can obscure a substantial transfer of costs onto solar households. Customers need the expected dollar and percentage change in what they will actually pay, with any exclusions clearly explained.

The November 3, 2026 response to me from the Commission's Consumer Complaint Resolution Division presents another concern. It describes typical daily peaks of 3 to 4 kW as producing a $16 to $22 monthly demand charge, while its calculation example uses $0.14 per

kW of daily demand. Exhibit C. Over a 30-day billing period, 3 to 4 kW each day at that rate produces $12.60 to $16.80. The email does not identify assumptions that reconcile the difference. It also refers to an October 2026 bill presentation while stating that the charge takes effect in January 2027.

These may be outdated figures or explainable differences. The point is that even the response intended to clarify the charge leaves customers with incompatible numbers. I request a single, accurate explanation identifying the applicable tariff, billing period, effective date, and treatment of solar credits, followed by corrections to inconsistent materials.

5. NV Energy itself offered much more reasonable fixed charge as an alternative

In her original direct testimony, Janet Wells offered a $24 monthly Basic Service Charge if the Commission rejected demand pricing, linking that alternative to the same claimed fixed-cost shortfall for net-metering customers. That was $5.50 above the then-existing $18.50 charge, or $66 annually. Wells-Direct 22, Q16; Exhibit E.

My projected $303.00 annual increase is about 4.6 times that $66.00 fixed fee increase. This compares a total-bill change with one component, so it does not establish overcollection. It does require a complete comparison using identical usage, export credits, and revenue assumptions. The Commission should determine why daily demand is preferable to the company's own alternative for households facing large increases.

The $24.00 amount was an alternative offered for consideration. I request evidence showing what my bill and other solar customers' bills would be under a properly designed fixed-charge alternative. The relevant question is whether the chosen design places an avoidably large burden on these customers while achieving the same legitimate purpose.

6. The original solar examples require scrutiny and information

Samantha Prest's original testimony modeled annual increases of 82.8, 24.9, and 19.0 percent for three sampled solar accounts, using Tranche 4 assumptions and excluding credit banking. Customer 1 showed a 3,694.9 percent winter increase. Prest-Direct 50–51, Q46 and footnote 15; Exhibit F. Those examples disclosed that substantial increases were possible.

They do not show how common such increases would be across the solar population. They were supposedly three random sampling customers for the purpose of illustrating a point to the PUCN. Now we have much more data available and it should be examined.

NV Energy's "three randomly selected solar accounts" illustrate possible outcomes, but do not, by themselves, establish how frequently or severely the broader solar population will be affected. The National Institute of Standards and Technology's statistical guidance evaluates sample adequacy through representativeness, sample size, population variability, and precision; before relying on these examples to justify mandatory changes in residential billing, the Commission should require NV Energy to demonstrate that its analysis satisfies those principles. NIST/SEMATECH e-Handbook of Statistical Methods, §§ 3.1.3.4 and 3.3.3.3.

I ask the Commission to identify the representative analysis it relied upon, the treatment of banked credits, and the seasonal dollar figures behind these results. The investigation should compare that record with the present calculator results and determine whether the overall presentation materially understated the magnitude or prevalence of solar-customer increases. The new evidence is the later account-specific comparison, current public explanations, and reports concerning the calculator now offered to customers. I ask whether those implementation results expose a material gap between the original assumptions and the actual burden now projected.

7. Other customers report similar problems with the tool

Exhibit G contains selected screenshots of public Reddit comments, with usernames and source links. One customer who says they do not have solar says the tool projects and increase for them annually of $124.00. Another non-solar customer reports an annual increase of $41.00. This is in contrast to public information that has been distributed by NV Energy that asserts that the average non-solar ratepayer will see their bills drop slightly (non-solar customers $154.00/mo, with daily demand $152.00/mo.) See Exhibit B. Several solar customers post that they are seeing the tool predict increases of $349.00, $254.00, $195.00 and $321.00 annually.

While these are internet posts, I offer them as specific leads for investigation, not proof of fraud or as a representative survey. They should demonstrate to the PUCN as well as NV Energy that this is a problem that affects many people, and that it isn't simply one ratepayer complaining. The Commission should require NV Energy to explain those differences and determine whether the display gives customers a fair picture of expected payments. A corrected baseline can be just as important as a corrected forecast.

8. Comparable experience should be demonstrated

Nevada Power's mandatory residential daily-demand structure represents a novel departure from established residential billing practices. Experience with optional demand plans does not, by itself, establish how this structure will affect customers required to participate, particularly households with rooftop solar. The Commission should require evidence that the projected bill impacts, customer disclosures, and safeguards have been adequately tested before allowing mandatory implementation.

NV Energy's fact sheet describes the charge as neither experimental nor unproven. Exhibit D. The Commission should require NV Energy to identify operating programs that actually match this design: mandatory residential billing based on each day's highest 15-minute demand, including customers with monthly net metering. Experience with voluntary demand tariffs or large commercial accounts does not by itself establish the effects on these households.

NV Energy should identify those programs, their results, and any safeguards for solar customers. If the relevant experience is limited, that is a reason for careful validation and transition protection before mandatory implementation.

9. Home vehicle charging and summer cooling require separate analysis

The investigation should also examine households that charge electric vehicles at home, particularly those with rooftop solar. Charging can overlap with air conditioning and ordinary household activities, substantially increasing the highest 15-minute demand recorded that day. Moving charging overnight does not necessarily solve this problem because air conditioning

may continue operating during hot summer nights. These households may face disproportionate increases, but the actual total-bill effect must be measured after accounting for reduced energy rates and all applicable credits.

This concern is supported by NV Energy's own legislative testimony. At the April 21, 2026 meeting of the Joint Interim Standing Committee on Growth and Infrastructure, Chair Howard Watts asked about a dishwasher running at 1 a.m. while an electric vehicle charges and air conditioning switches on. Shawn Elicegui of NV Energy confirmed that overlapping those loads drives daily demand regardless of the hour. He recommended staggering vehicle charging, washing machines, and air conditioning. Chair Watts responded, "That is a lot of scheduling." Official minutes, pp. 13–14; Exhibit I.

The Commission should examine whether that advice is practical for households that need overnight cooling and a charged vehicle for daily transportation. Customers can schedule some appliances, but preventing air conditioning from cycling during a charging session may require reduced cooling, slower charging, or additional controls. The investigation should determine what reasonable options actually exist and what they cost. It should also examine whether a charge based on a household's individual peak reasonably reflects the local distribution costs that household causes, including when charging occurs outside system peak hours.

I do not contend that every EV household will pay more, or that charging creates no distribution costs. I request evidence showing the frequency and size of total-bill increases for these customers, including solar households with one or more vehicles, and whether the public assurances of minimal impact accurately describe their experience. Exhibit I reproduces the official minutes' title page and pages 7–16, including the surrounding explanation of cost recovery and the discussion of time-of-use rates and rooftop solar.

10. Information the investigation should obtain

I request an order directing NV Energy to provide the following information, subject to appropriate protection of individual customer data:

1. An auditable calculation for my account, showing daily demand measurements, consumption, exports, applicable tariff versions, taxes, other charges, and credits under both scenarios. It should reconcile the displayed current-plan amount with actual bills and separately identify changes unrelated to daily demand.

2. The calculator's methods and validation results, including treatment of carryover credits, accounts with net exports, incomplete data, tariff changes, and corrections. Preserve the versions of the tool, inputs, and public explanations used since its release.

3. An anonymized analysis of solar-customer impacts by tariff and net-metering tranche, including median and average dollar and percentage changes, and the number of accounts facing increases above 10, 20, 30, and 50 percent. Show results with and without banked credits and identify the period and assumptions.

4. A reconciliation of the original testimony, the average-bill illustration, the fact sheet, the Commission correspondence, and current account estimates. Identify the analysis of the frequency and severity of solar increases that was before the Commission when it approved the charge.

5. A comparison of daily demand with the fixed-charge alternative and other lawful options using consistent revenue requirements, usage, and credits. Explain the distribution costs recovered through each component and how double recovery is avoided. Identify the relationship between individual daily peaks and the costs assigned to solar households.

6. An explanation of the sampled winter increase, including underlying dollar amounts and the method of averaging or aggregation; comparable-program evidence; and proposed corrections or safeguards if the investigation identifies material problems.

7. A separate analysis of total-bill impacts for households charging electric vehicles, distinguishing solar and non-solar customers, one and multiple vehicles, charging power, charging frequency, overnight charging, and overlapping summer cooling loads. Include all offsetting energy-rate changes and credits. Explain the relationship to distribution costs, the interaction with time-of-use and EV rates, and the practical cost and effectiveness of any proposed mitigation.

11. I request that the Commission:

1. Accept and docket this general petition, place the request for an investigation on the earliest practicable properly noticed agenda, and set further proceedings rather than allowing it to be deemed denied under NAC 703.540.

2. Open an investigation and establish a prompt schedule for the disclosures requested above, responses, and an evidentiary hearing. I expressly request that hearing under NAC 703.560(5).

3. Hold a consumer session so affected residents can describe their projected burdens and experiences with the tool. This consumer-initiated petition does not appear to trigger the mandatory-session conditions of NRS 704.069(1), but a session is warranted. It should supplement the evidentiary hearing, not replace it.

4. Provide an opportunity for the Bureau of Consumer Protection, Regulatory Operations Staff, NV Energy, and affected customers to participate. I seek party status as petitioner; any additional intervention required in another proceeding should be addressed by procedural order.

5. Consider, before January 1, 2027 and after appropriate notice and an opportunity to respond, whether lawful interim relief should delay implementation or protect customers while the disputed calculations and impacts are examined. This petition does not itself suspend any tariff.

6. After hearing, modify, replace, or discontinue the mandatory charge if warranted under NRS 704.120. Consider a lawful fixed-charge alternative, optional participation, phased implementation, or other protections supported by the evidence. Require correction of misleading or inaccurate public information and calculator results.

7. Issue a written order addressing the investigation request and available prospective remedies, including any jurisdictional limitations. If another procedural step is necessary, identify it and allow a reasonable opportunity to comply.

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I am asking the Commission to examine the burden before it is imposed. A generic assurance that the change is revenue neutral and 'modest' does not answer whether the underlying estimates are reliable or whether the costs have been allocated fairly or accurately. Those are questions the Commission can resolve through evidence.

DATED: _ November 6, 2026

Signature: 

JAY P. RAMAN

Petitioner appearing on my own behalf

Declaration of Jay P Raman

1. I am an adult Nevada Power residential customer in Las Vegas. I make the statements below from personal knowledge.

2. My account is on RES-NMR-405 Tranche 4. My solar system was installed in December 2024.

3. On November 1, 2026, I accessed the account comparison reproduced in Exhibit A through NV Energy's website. It shows $788 under Current Plan, $1,091 under Daily Demand, and a $303 estimated annual difference for September 2025 through August 2026.

4. Exhibit B reproduces the NV Energy average-bill illustration I supplied with my original petition. Exhibit C reproduces the November 3, 2026 email received in response to my concerns. Exhibit D reproduces the attached NV Energy fact sheet.

5. I have not independently verified NV Energy's calculator. I request the underlying information needed to understand and verify its result. I have not already paid the projected additional demand charge.

6. Exhibits E and F reproduce pages of NV Energy's published testimony. Exhibit G contains screen shots of public comments from Reddit, whose underlying accounts I have not verified. I do not attest to the truth of other customers' billing claims; I offer them as leads for investigation. Exhibit H contains captures of NV Energy's public webpage. Exhibit I reproduces pages from the Legislature's published minutes.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed on November 6, 2026

Signature: 

JAY P. RAMAN

Exhibit index

A My NV Energy annual comparison

B NV Energy average monthly bill illustration

C November 3 2026 Commission email

D NV Energy Daily Demand Fact Sheet (June 2026)

E Janet Wells direct testimony pages 22–23

F Samantha Prest direct testimony pages 50–51

G Selected public customer reports —excerpts

H NV Energy public webpage captures

I April 21 2026 legislative minutes title page and pages 7–16

Exhibit A My annual comparison

NV Energy account comparison accessed November 1, 2026. Historical period: September 2025 through August 2026. The displayed $303 difference equals a 38.45 percent increase; that percentage is calculated, not printed in the image.

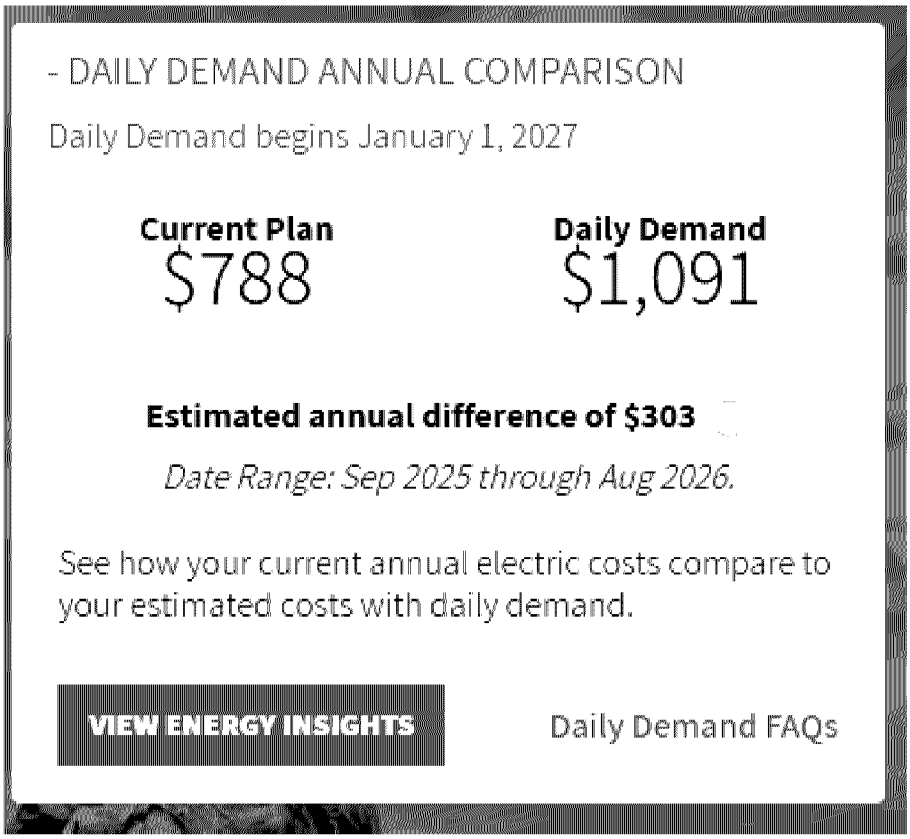
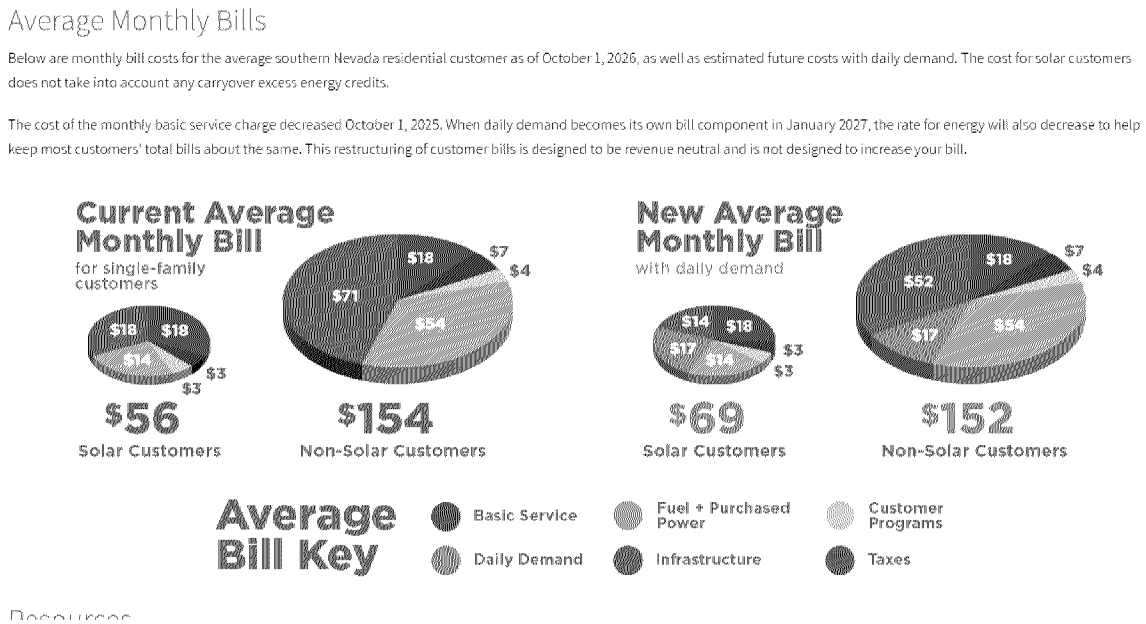


Exhibit B Average monthly bill illustration

NV Energy's illustration supplied with the original petition. The solar comparison is $56 to $69, a calculated 23.21 percent increase. The illustration describes average bills, not a maximum increase.



Source: https://www.nvenergy.com/about-nvenergy/rates-regulatory/daily-demand

Exhibit C Commission email Page 1

Gmail

Jay Raman <ramanj1@gmail.com>

NV Energy Daily Demand Rate

Kellie Nichols <kdnichols@puc.nv.gov> Tue, Nov 3, 2026 at 1:56 PM
To: "ramanj1@gmail.com" <ramanj1@gmail.com>
Cc: Donald Lomoljo <dlomoljo@puc.nv.gov>

Dear Mr. Raman,

This is in response to your email and phone call on November 2, 2026, to the Public Utilities Commission of Nevada ("PUCN" or "Commission") regarding NV Energy's Docket No. 25-02016, which was approved by the Commission on September 16, 2025. Thank you for taking the time to contact us and express your concerns.

The Consumer Complaint Resolution Division ("Division") understands your concerns with the new Demand Charges for Electric Utility Customers in Southern Nevada. On February 13, 2026, NV Energy filed Notice No. 26.01 to implement its first 2026 Base Tariff Energy Rate and Deferred Energy Accounting Adjustment quarterly changes. The filing also included tariffs for the new residential daily demand charge

Petitions for Judicial Review challenging the Commission's approval of the new Demand Charge for Electric Utility Customers in Southern Nevada has been heard in The Eighth Judicial Court in Clark County, Case No. A-25-934678-J and the First Judicial District Court in Carson City, Case No. 25-OC-00204-1B. Both Courts affirmed the Commission's decision to approve the new demand charge for Southern Nevada customers.

NV Energy has decided to temporarily postpone implementation of the demand charge until January 1, 2027. This delay is intended to prioritize customers by giving them time to understand daily demand and ensure that they have the information and tools needed to assess its impact on their bills. See NV Energy's Daily Demand flyer. You may also go to NV Energy's website Southern Nevada Daily Demand | NV Energy; on this page they have a daily demand web tool that you can use to see how your personal energy translates into your daily demand.

- The daily demand charge will go into effect on January 1, 2027. Previously your bill showed two components, the Basic Service Charge and the per kWh rate. In October 2026, your bill will show three components, the Basic Service Charge, per-kWh rate and the Demand kW rate. The demand charge is not intended to increase the utility's revenue.
- The Commission approved this charge to more fairly recover costs for local distribution infrastructure (e.g. transformers, service lines, meters), not generation or transmission. The Commission determined that the charge could help lower bills for customers who were previously paying more than their fair share and give customers more control over their bills.
- The average daily residential peak ranges from 2.6 kW to 6.8 kW over the course of a year. Typical peaks would be between 3 kW and 4 kW, which would result in a monthly demand charge of $16 and $22. The demand charge will reduce the per-kWh rate, so the bill for a typical customer will not increase. Customers could see a 1.5% lower bill than the previous rates that did not include a demand charge.

How the Daily Demand Charge is Calculated:

- NV Energy measures the customer's power usage in 15-minute increments. They will identify the highest 15-minute usage in kW during each day of the monthly billing period.
- NV Energy will add up the daily highest kW for the month to calculate a total of daily kW peak usage. NV Energy will then multiply the total by the demand charge.

Exhibit C Commission email Page 2

- Example: If your daily demand total 120 kW over the month, with a demand charge rate of $.14 per kW, the daily demand charge would be $16.80 (120kW x $0.14/kW = $16.80)

I hope the information provided addresses the concerns you raised. Your comments and concerns will remain on file with the Consumer Complaint Resolution Division of the PUCN for three years.

Sincerely,

Don Lomoljo
Staff Counsel

PUCN

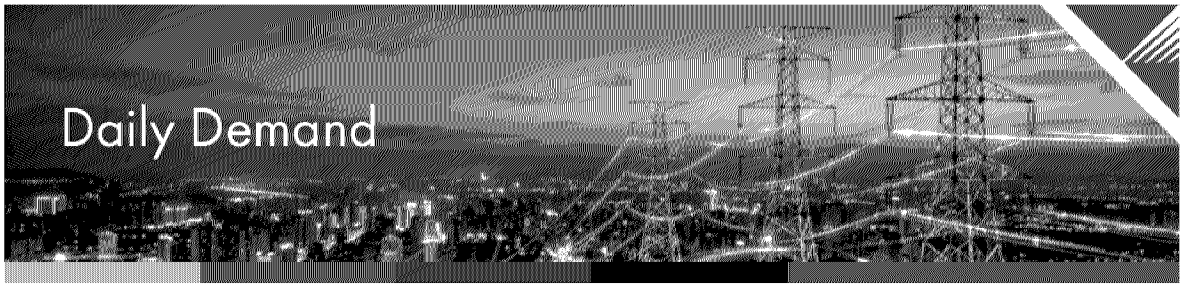
Kellie Nichols

Senior Compliance Investigator
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Daily-Demand-Fact-Sheet.pdf
377K

Exhibit D NV Energy fact sheet Page 1



WHAT IS IT?

NV Energy will introduce restructured energy bills in Southern Nevada beginning on January 1, 2027. This update will include daily demand for residential and small commercial customers. This update is designed to modernize how electric service costs are structured, without increasing NV Energy's overall revenue.

Currently, customer bills include a basic service charge and an energy usage charge (based on total electricity consumed). These components will be reduced slightly and beginning in January, daily demand will be separated from the energy rate to more accurately reflect the cost of delivering electricity when it is needed most.

WHAT IS IT NOT?

Daily demand is NOT

- A new charge on customer bills
- An experimental or unproven rate
- A time of use rate

The change is revenue-neutral and focused on cost accuracy and fairness.

WHY?

Daily demand more accurately captures the cost of maintaining and delivering energy during periods of highest demand on the system. It also improves fairness in how costs are shared among customers.

The updated structure:

- Aligns charges with actual system usage patterns
- Addresses cost-shifting between rooftop solar and non-solar customers
- Ensures all customers pay equitably for the grid infrastructure they rely on

By law, all customers must be charged consistently. Under the current structure, some costs are not evenly distributed. Daily demand helps correct that imbalance.

HOW DOES IT WORK?

Daily demand is calculated based on each customer's highest 15-minute interval of electricity use and this resets every day of the month. These daily peaks are totaled over the billing period to determine the monthly Daily Demand charge. A typical household will see a daily demand total of approximately $0.49 per day.

At the same time:

- The basic service charge has already decreased (effective October 1, 2025).
- The per-kilowatt-hour energy rate will decrease when daily demand is implemented.
- These adjustments are designed to keep total customer bills approximately the same overall.

HOW DOES IT IMPACT CUSTOMERS?

Most customers are expected to see little to no change in their overall bill, and many may see slight decreases.

Customers can:

- Maintain current usage habits with minimal impact
- Lower bills by managing peak usage periods, if they choose

Rooftop solar customers in Southern Nevada may see a modest bill increase due to more accurate cost allocation.

Status:
Daily demand will take effect January 1, 2027, for Southern Nevada customers.

The rate structure has been reviewed and upheld through extensive regulatory and legal processes, including affirmation by two courts as reasonable and supported by substantial evidence.

Continued on reverse

NVEnergy

2026-06

On May 26, Justice Holthus of the Eighth Judicial District Court said of daily demand:

> *"Ninety percent of the people paying for 10% of the people, I just keep coming back to that. At the end of the day, it sounds like 100% of the people are going to have better rates. Now, the 10% are going to be higher than they would have been without this, but they're still going to be lower than this 90%, and there's still the benefits. The way the evidence comes to me, 100% of the people are going to gain from this."*

Ahead of implementation, Southern Nevada customers will receive educational materials that highlight the largest sources of energy use in their home and provide a comparison showing what a recent bill would have looked like under the new rate structure. Customers will also have access to web-based tools that offer detailed insights into when energy is used, along with tips and programs to help manage usage through behavioral changes and technology.

NVEnergy

Exhibit E Wells direct testimony page 22

Nevada Power 2025 general rate case, Volume 5; PDF page 24. Accessed November 5, 2026.

Source: https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/rates-regulatory/recent-regulatory-filings/south/grc/NPC-Volume-5.pdf#page=24

16. Q. THE COMPANY HAS PROPOSED A THREE-PART RATE DESIGN FOR RESIDENTIAL AND SMALL COMMERCIAL CLASSES. DO YOU HAVE A RECOMMENDATION TO THE COMMISSION FOR AN ALTERNATIVE IF THE COMMISSION REJECTS THIS PROPOSAL?

A. Yes, I do. Nevada Power's primary proposal is to include a demand charge for all residential and small commercial classes, as supported by Mr. Bohrman. If the Commission chooses not to support this proposal, the Company respectfully requests that the Commission support an increase to the basic service charge (BSC). The Company's proposal in this GRC is to maintain the current BSC only because of the proposal to include a demand charge. However, denial of the request for the demand charge would require another solution to address the fact that NEM customers are not paying their equitable share of fixed costs recovered in the energy rate, meaning that a higher BSC would be appropriate and supportable.

If the Commission elected not to proceed with the demand charge, the Company requests that the Commission approve an increase to the BSC, as was done in the 2023 Nevada Power GRC, creating more equity between customers. For example, in this case, the Commission could appropriately increase the BSC to $24.00, an amount that would reflect movement towards placing more of the costs that are fixed in nature into the BSC rather than keeping those costs in a volumetric charge.

17. Q. HOW DOES THE COMPANY'S PROPOSAL IMPACT THE AFFORDABILITY DISCUSSED ABOVE?

A. As described in the testimony of Ms. Prest, for an average customer, the Company's proposal does not impact the overall bill any differently than if the current rate design remained. In this case, an average customer would need to be described as

Exhibit E Wells direct testimony page 23

Nevada Power 2025 general rate case, Volume 5; PDF page 25. Accessed November 5, 2026.

Source: https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/rates-regulatory/recent-regulatory-filings/south/grc/NPC-Volume-5.pdf#page=25

average usage and average pattern of usage. For the average customer described above, the overall bill would remain at $156 but rather than an $18.50 basic service charge with the remaining $137.50 in charges based on kWh usage, the Company's proposal would result in an $18.50 basic service charge, $19.95 demand charge (average daily demand of 3.5 kW multiplied by 30 and then applied to the proposed $0.19/kW rate), and the remaining $117.55 in charges based on kWh usage. Both bills sum to $156, both have a basic service charge that represents 12 percent of the bill, and the remaining portion of both bills can be influenced by the customers decisions around energy efficiency and changes in consumption behavior. The Company's proposal in this case provides a more equitable outcome for all customers. The proposed demand charge specifically provides greater affordability for all customers.

18. Q. THE COMPANY HAS PROPOSED A CHANGE TO THE NETTING FOR FUTURE NEM CUSTOMERS. DO YOU HAVE A RECOMMENDATION TO THE COMMISSION FOR AN ALTERNATIVE IF THE COMMISSION REJECTS THIS PROPOSAL?

A. Yes. Nevada Power's primary proposal is to change to a 15-minute netting period for all future NEM customers, as supported by Mr. Bohrman. If the Commission chooses to not support this proposal, the Company respectfully requests that the Commission allow the Company to reinstate the AB405 NEM regulatory asset until such time as an alternative can be identified and implemented.

Exhibit F Prest direct testimony page 50

Nevada Power 2025 general rate case, Volume 11; PDF page 96. Accessed November 5, 2026.

Source: https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/rates-regulatory/recent-regulatory-filings/south/grc/NPC-Volume-11.pdf#page=96

neutral or experience a slight decrease in their annual bills regardless of their annual usage as shown with Customers 1 and 2. Customers who use more efficiently, such as Customer 3, can experience bill savings from the Company's proposed rate design. **Table Prest-Direct-10** also shows that the Company's rate design can also help to reduce high summer bills, while potentially increasing winter bills for the average customer.

46. Q. DID YOU PERFORM THE SAME ANALYSIS ON CUSTOMER USAGE FOR NEM CUSTOMERS?

A. Yes, similar to the RS class, 15-minute interval data was pulled for three random RS-NEM customers. Following the same analysis, **Table Prest-Direct-11** below shows the average summer, winter, and annual bill impacts for these customers.[15]

TABLE PREST DIRECT-11: SAMPLED RS-NEM CUSTOMER DDP BILL IMPACTS

Customer	Average Peak (kW)	Average Monthly Del Usage (kWh)	Average LF	Summer Bill Impact	Winter Bill Impact	Annual Bill Impact
1	4.13	563	19%	20.0%	3694.9%	82.8%
2	3.14	723	31%	17.3%	33.9%	24.9%
3	14.94	2,496	23%	7.2%	29.7%	19.0%

As discussed earlier, the table shows that the majority of NEM customers will see an increase in their annual bills with the implementation of a demand charge due to the decrease in the volumetric rate. Some customers, such as Customer 1, will see a larger percent increase during the shoulder months where NEM customers tend to have higher amounts of excess energy that they put back onto the grid. For

[15] For this analysis, it was assumed that these customers are billed as NMR-405-Tranche 4 customers where their monthly netted kWh that they put back onto the grid is credited at 75 percent of the retail rate. For simplicity, the banking mechanism for monthly netting was ignored.

Exhibit F Prest direct testimony page 51

Nevada Power 2025 general rate case, Volume 11; PDF page 97. Accessed November 5, 2026.

Source: https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/rates-regulatory/recent-regulatory-filings/south/grc/NPC-Volume-11.pdf#page=97

example, Customer 1's March bill increases from a $15 credit with a two-part rate structure to having a charge of $16 for that month with a demand charge. It is important to note that while all three sampled NEM customers show increases in their annual bills under the Company's proposal, they will still experience lower overall bills than the full-requirements customers. NEM customers will additionally have the same opportunity to lower their monthly bills by improving the efficiency in which they use the system.

47. Q. PLEASE DISCUSS THE COMPANY'S RATE DESIGN PROPOSAL FOR THE OPTIONAL TOU CLASSES.

A. The optional residential and small commercial customers, including those on the CPP classes, will be charged the same distribution demand rate as the standard flat rate classes. These classes will additionally have a TOU based demand charge that recovers 100 percent of the class transmission costs. For the optional residential customers, the customers will be charged a TOU demand charge applied to the sum of the customer's daily 15-minute maximum peak during the Summer On-Peak and Winter TOU periods during the billing period. This is the same rate design that is currently used for the optional DDP schedules. The OGS class will likewise have the same TOU based demand charges as well that will recover 100 percent of their transmission costs as the flat facilities demand charge, but the rates are based on the customers maximum 15-minute period during the Summer On-peak and Winter peak TOU periods instead of a daily demand. This is a similar rate design as the optional large commercial class, OLGS-1-TOU.

Exhibit G Selected public customer reports

Transcribed public comments — underlying accounts unverified

Source reviewed November 5, 2026: r/vegaslocals, "NVEnergy added tools to show your daily demand charge differences." These are selected comments, not a representative sample. Dollar figures are the posters' statements. No account records were obtained or authenticated.

Thread:
https://www.reddit.com/r/vegaslocals/comments/1vybrr2/nvenergy_added_tools_to_show_your_daily_demand/

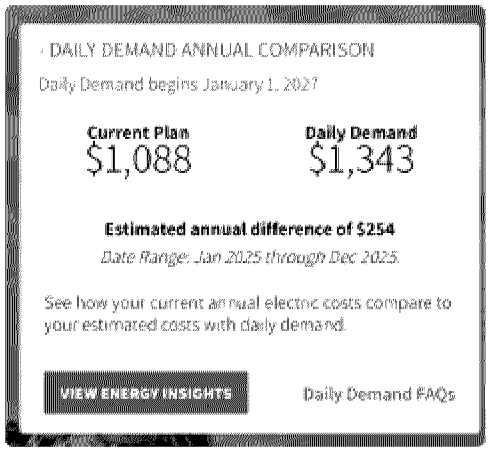
TrojanGal702 • 2mo ago
Top 1% Commenter

No solar and a $124 increase.

12 Reply Award Share ···

ascottallison • 2mo ago

$254 increase, or 23%

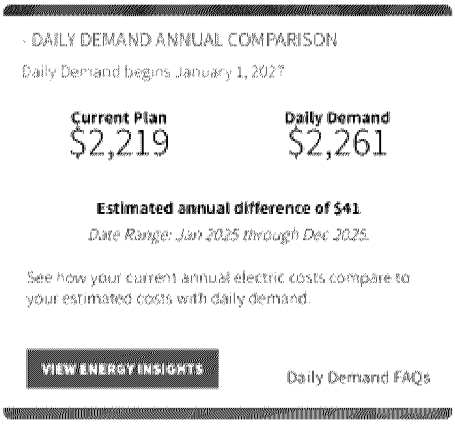


3 Reply Award Share ···

Exhibit G Selected public customer reports cont.

nekizalb OP • 2mo ago

For me, they estimate a $41 annual increase, less than $4/month. No solar



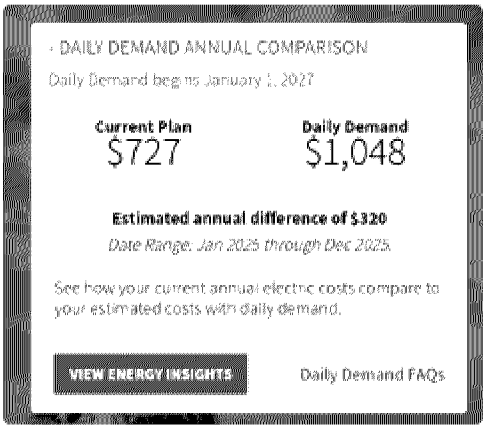
5 Reply Award Share ...

Nosferatu646 • 2mo ago

Just checked mine, and it's a $349 increase. I have solar. Not too happy with the changes. It just doesn't make sense. It feels like I am being punished for trying to save money and help the grid. What is the point in having solar?

8 Reply Award Share ...

sirwellingtonz • 2mo ago



I have a 10.8 kw solar array and I also charge my EV(s) overnight.

1 Reply Award Share ...

Exhibit G Selected public customer reports cont.

In the separate thread titled "NVEnergy 'Daily Demand Comparison Tool' is a Fraud," :

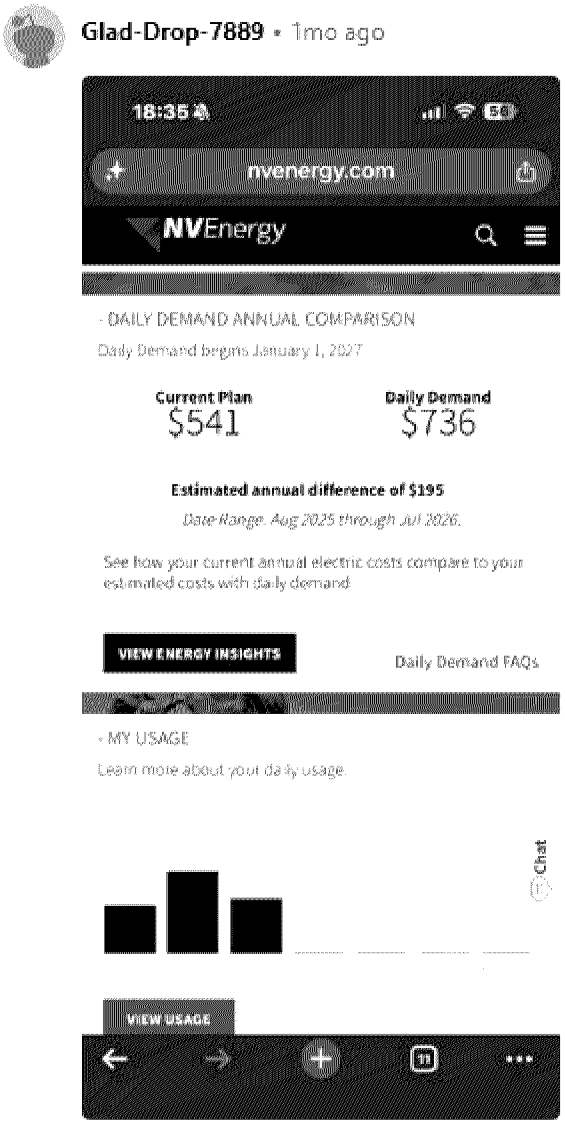


Exhibit H NV Energy public webpage

Southern Nevada Daily Demand. Browser capture, November 5, 2026. Upper portion of webpage.

Source: https://www.nvenergy.com/about-nvenergy/rates-regulatory/daily-demand

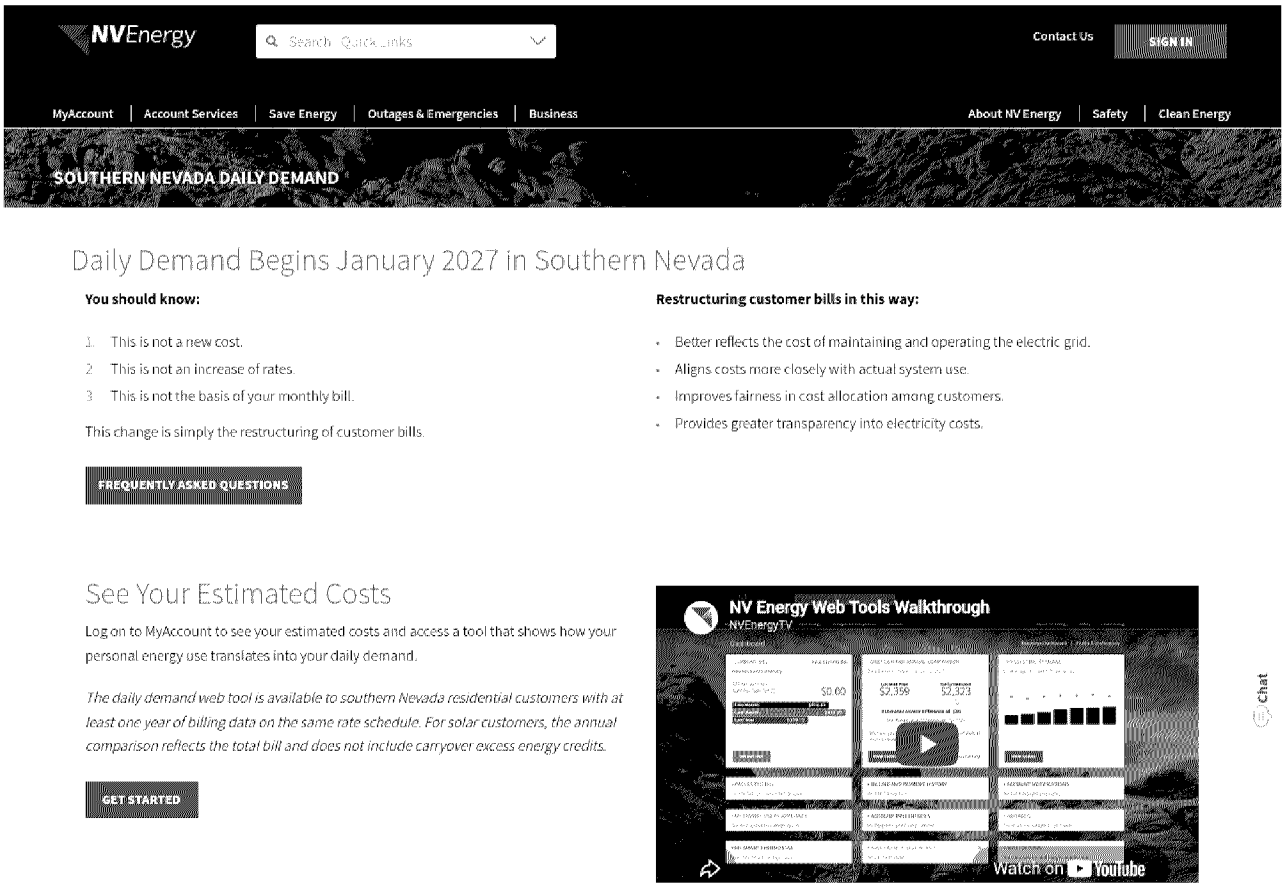


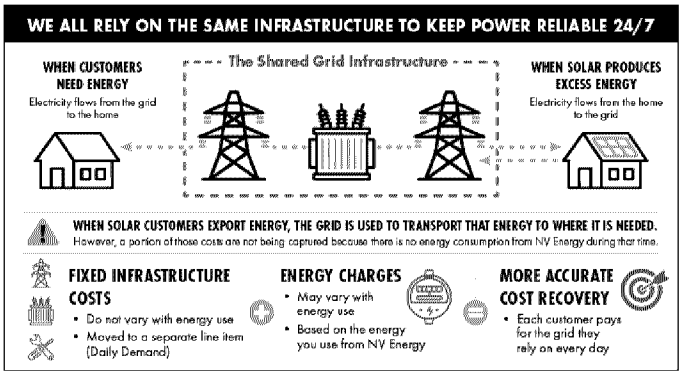
Exhibit H NV Energy public webpage continued

Browser capture, November 5, 2026. Cost-recovery explanation and comparison disclosures; viewport excerpt.

Source: https://www.nvenergy.com/about-nvenergy/rates-regulatory/daily-demand

Why Daily Demand?

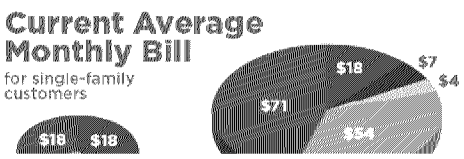
We are investing in solutions that will keep Nevada's energy grid resilient, reliable, and ready for the future. Daily demand allows for fair cost recovery of grid expenses and ensuring reliable service for all customers. By moving fixed infrastructure costs out of the energy charge, the cost to serve each of our customers is more accurately reflected.



Average Monthly Bills

Below are monthly bill costs for the average southern Nevada residential customer as of October 1, 2026, as well as estimated future costs with daily demand. The cost for solar customers does not take into account any carryover excess energy credits.

The cost of the monthly basic service charge decreased October 1, 2025. When daily demand becomes its own bill component in January 2027, the rate for energy will also decrease to help keep most customers' total bills about the same. This restructuring of customer bills is designed to be revenue neutral and is not designed to increase your bill.



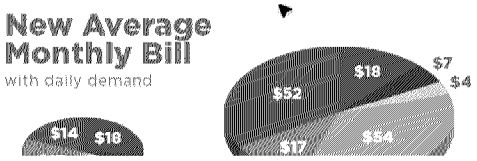


Exhibit I Legislative minutes page 1

Joint Interim Standing Committee on Growth and Infrastructure, April 21, 2026. Official minutes; selected original pages. Accessed November 5, 2026.

Source: https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/34209#page=1

NEVADA LEGISLATURE
JOINT INTERIM STANDING COMMITTEE ON GROWTH AND INFRASTRUCTURE

(*Nevada Revised Statutes* [NRS] 218E.815)

MINUTES

April 21, 2026

The fourth meeting of the Joint Interim Standing Committee on Growth and Infrastructure for the 2025–2026 Interim was held on Tuesday, April 21, 2026, at 9 a.m. in Room 165, Nevada Legislature Office Building, 7230 Amigo Street, Las Vegas, Nevada. The meeting was videoconferenced to Room 3137, Legislative Building, 401 South Carson Street, Carson City, Nevada.

The agenda, minutes, meeting materials, and video recording of the meeting are available on the Committee's meeting page. The video recording may also be found at https://www.leg.state.nv.us/Video/. Copies of the video record can be obtained through the Publications Office of the Legislative Counsel Bureau (LCB) (publications@lcb.state.nv.us or 775/684-6835).

COMMITTEE MEMBERS PRESENT IN LAS VEGAS:

Assemblymember Howard Watts, Chair
Senator Rochelle T. Nguyen, Vice Chair
Senator Carrie Ann Buck
Assemblymember Max E. Carter II
Assemblymember Venise Karris
Assemblymember Heidi Kasama
Assemblymember Jason Patchett

COMMITTEE MEMBER ABSENT:

Senator Fabian Doñate (Excused)

LEGISLATIVE COUNSEL BUREAU STAFF PRESENT:

Keely Latham, Senior Policy Analyst, Research Division
Anthony Ciaramella, Senior Policy Analyst, Research Division
Terese Martinez, Research Policy Assistant, Research Division
Lauren Spratt, Deputy Legislative Counsel, Legal Division

Exhibit I Legislative minutes page 7

Joint Interim Standing Committee on Growth and Infrastructure, April 21, 2026. Official minutes; selected original pages. Accessed November 5, 2026.

Source: https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/34209#page=7

Chair Watts:

All right, thank you everyone. Again, we will have a public comment period again at the end of today's meeting. With that, we will move on to Item Number III on our agenda, which is the approval of the minutes for our February 3rd meeting.

AGENDA ITEM III—APPROVAL OF THE MINUTES FOR THE MEETING ON FEBRUARY 3, 2026

Members, are there any discussion, questions, corrections for these minutes? Seeing none, I would accept a motion to approve these minutes.

ASSEMBLYMEMBER KARRIS MOVED TO APPROVE THE MINUTES FOR THE MEETING ON FEBRUARY 3, 2026.

ASSEMBLYMEMBER CARTER SECONDED THE MOTION.

THE MOTION PASSED UNANIMOUSLY.

*****

AGENDA ITEM IV—PRESENTATION ON DEMAND CHARGES, 15-MINUTE NET METERING, THE IMPLEMENTATION OF ASSEMBLY BILL 452 (2025), AND NV ENERGY'S LATEST INTEGRATED RESOURCE PLAN

Chair Watts:

We will now move into our presentations for the day. Just as a note, due to some scheduling issues, we will be taking some presentations out of order and may be doing a little bit of back and forth on at least one of the items. Our first presentation is from NV Energy who will be discussing some updates on rates, resource planning, and other issues. Welcome, Mr. Sanchez. I think we have Mr. Elicegui up in Carson City. Welcome to you both. Go ahead, take a moment to get ready and as soon as you are—you may begin.

Tony Sanchez, Executive Vice President, Business Development and External Relations, NV Energy:

Thank you, Mr. Chairman, members of the Committee. I am joined today, as you noted, Mr. Chairman, by my colleague, Shawn Elicegui, from your Carson City hearing room. Shawn is our Senior Vice President of Regulatory and Resource Planning, and he has a presentation that he will walk you through, and we would be happy to answer any questions after that.

Shawn Elicegui, Senior Vice President, Regulatory and Resource Planning, NV Energy:

Good morning, Mr. Chairman. Thank you for your time today, members of the Committee. Tony, do you want to run the slide deck? (Agenda Item IV) Okay, we will start off—our presentation covers four topics today. First, we are going to cover the mechanics of 15-minute netting for new net metering customers in northern Nevada. Second, we are going to cover the mechanics of daily demand for residential customers in southern Nevada. Third, we will provide an update on AB 452 [Assembly Bill] and customer misclassification refunds. Fourth and finally, we will cover NV Energy's—the status of its 2026 Joint Integrated Resource Plan. I want to note by starting, that topics one and two—that is

Exhibit I Legislative minutes page 8

Joint Interim Standing Committee on Growth and Infrastructure, April 21, 2026. Official minutes; selected original pages. Accessed November 5, 2026.

Source: https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/34209#page=8

15-minute netting and daily demand—involve the exact same topic that we spoke about a couple of weeks ago with respect to data centers. Specifically, these topics focus on fair and responsible cost sharing, which ensures that energy remains affordable for all customers. The point and the bottom line—the fundamental element of the discussion with data centers, as well as these two topics—is ensuring that the activity that drives utility costs pays for those utility costs.

Fifteen-minute netting. The basics of 15-minute netting is NV Energy has meters that measure the exchange of energy. That is how much energy is delivered, and how much energy is received by NV Energy from a customer generator, as well as delivered to the customer generator every 15 minutes. The value of energy varies based on time.

Monthly netting works in the exact same way as 15-minute netting with one difference—the point at which you measure how much energy was exchanged between the two parties. In 15-minute netting, you calculate how much energy was delivered and how much energy was received every 15 minutes, and you then net the two. Monthly netting, you do the same thing but at the end of the month.

Why is 15-minute netting important? Because monthly netting does not accurately measure when a customer generator produces energy and when a customer generator uses energy. Because energy has value based on time, it is important to ensure that the customer who generates energy in a 15-minute window gets compensated for that energy. It is equally important to ensure that when NV Energy delivers more energy in a 15-minute window, the customer pays for the energy that is delivered. This is precisely how energy markets work. NV Energy has participated in the energy imbalance market since 2016. We exchange energy with California, Oregon, Washington, Utah, Arizona, Idaho, and New Mexico. We settle the exchange of energy or the imbalance of energy every 15 minutes, which is precisely what 15-minute netting does in northern Nevada for new net-metering customers. It settles the exchange of energy every 15 minutes. If the Committee would like, Mr. Chairman, I would be happy to take questions on this topic before I move to the next topic or just save questions for the end, whatever your pleasure.

Chair Watts:

Thank you, Mr. Elicegui. I think it would be best for you to finish your presentation, and then we will take questions on all of the topics. So, members, please take notes if you have questions on some of these issues as we go along, and we will make sure to go through all of them at the end. Please proceed, Mr. Elicegui.

Mr. Elicegui:

Thank you very much, Mr. Chairman. I appreciate that. Turn to the mechanics of daily demand. As I mentioned, NV Energy's advanced metering measures energy every 15 minutes. Daily demand is calculated based on the highest 15-minute usage each day. At the end of the month, the usage, the highest 15-minute usage on each day, is counted up and a charge is assessed. Daily demand measures how—not when—customers use energy. Why is this important? Because the utility's costs fall into three basic buckets.

1. Costs that we have just because we have a customer. For example, a meter or the billing system. That is why we have a monthly basic service charge.
2. Costs that vary based on how much energy a customer uses, for example, fuel. That is why we have a volumetric or a kWh [kilowatt-hour] charge.

Exhibit I Legislative minutes page 9

Joint Interim Standing Committee on Growth and Infrastructure, April 21, 2026. Official minutes; selected original pages. Accessed November 5, 2026.

Source: https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/34209#page=9

3. Third, costs that vary based on how a customer uses energy. Those, for example, are investments in transformers. It depends on how a customer uses energy, the nature of the appliances or the equipment on their side of the meter.

A daily demand charge measures exactly that—how a customer uses energy, and it ensures that the costs of how a customer uses energy are aligned with the charges on the customer bill, further ensuring that fair and responsible cost sharing leads to more affordable energy for everyone.

What is the impact of daily demand charges? The average residential customer will see a bill reduction. Why is that? Because as we introduce a daily demand charge, we take costs that are currently reflected in that volumetric or kWh rate, and we move them to the demand charge which aligns with how a customer uses energy; and that reduces the kWh rate. This is not a new cost; it is just a new way of presenting a charge on the bill. So, customers who actually alter their behavior can also reduce their bill even more.

NV Energy intends to implement daily demand billing for residential customers in the South beginning January 1, 2027. The company is building reports and tools on what usage and appliances influence daily demand. The comprehensive education and information program that will provide as billed and will be billed pictures throughout the summer to customers. Direct grassroots and media outreach will also provide daily demand education, as will social media and website channels.

I will move on to the status of AB 452 and misclassification refunds. I want to start this section of the presentation by first being accountable and acknowledging our conduct. The company apologizes for misclassification errors. We are accountable for those errors, providing refunds to the tune of $63 million to customers because of those errors. I want to put the misclassification, as well, in context. Less than 4 percent of current residential premises were misclassified. If I focus solely on multifamily premises, less than 11 percent of multifamily premises were misclassified. This means that fewer than one in ten customers will see a refund, which we expect to roll out at some point during this summer. I also want to assure the Commission and the public that the company has taken steps to fix the root cause and strengthen controls so that this error and misclassification does not happen again. To prevent this, NV Energy has put 11 new controls in place, grouped into 4 reforms:

1. Initial classification controls;
2. Billing system enhancements;
3. Enhanced oversight and cross-functional reviews; and
4. Alignment of controls.

I will move on to the last topic, Mr. Chairman. This is the status of NV Energy's 2026 IRP [integrated resource plan] filing, which we are scheduled to make, and plan to make, on or about April 30, 2026. I want to start first with a description of the Distributed Energy Resource Plan. What is notable about this Distributed Energy Resource Plan is it will propose non-wires alternatives—embedded within the system—for the first time in the company's distributed resource planning process. The Transportation Electrification Plan will propose a $16.9 million budget. Energy efficiency—I should have moved the slide deck along. I apologize.

Exhibit I Legislative minutes page 10

Joint Interim Standing Committee on Growth and Infrastructure, April 21, 2026. Official minutes; selected original pages. Accessed November 5, 2026.

Source: https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/34209#page=10

I will move on to the Demand Side Management Energy Efficiency Plan. This plan will propose a $238 million budget, two-part energy goals of saving 171 megawatts, and almost 7 billion—700 million kilowatt-hours for 2027 and 2029.

Lastly, we will turn to the Supply Side Plan. It is very important to note that the core element of the Supply Side Plan is renewable energy additions. We will propose more than 4,300 megawatts—actually almost 4,500 megawatts—of new renewable energy generation, almost—over 5,100 megawatts of battery energy storage systems and almost 200 megawatts of geothermal energy production. To address the reliability point that Mr. Thompson made earlier, we do plan to propose about 1,200 megawatts of thermal generation. That ends our presentation, Mr. Chairman. I would be happy to entertain questions from the Committee.

Chair Watts:

All right, thank you. Members, do we have questions for our presenters? We will begin with Assemblymember Kasama.

Assemblymember Kasama:

Thank you, Chair. Thank you for the presentation. My question is with the new 15-minute metering—the highest demand charges during the day—is it possible that a ratepayer could actually be paying more money—or more on their bill—than the energy they are using? Or are there protections in place not for that to happen?

Mr. Elicegui:

The answer is that customers will not pay more for the amount of energy they are using. The kilowatt-hour rate or the volumetric charge will actually be reduced as the new daily demand charge is implemented—so, customers will pay for the energy they use based on the kilowatt-hour charge.

Chair Watts:

I am going—thank you. First of all, please remember to state your name each time before you speak, Mr. Elicegui—I know it is cumbersome.

Mr. Elicegui:

I apologize for that—

Chair Watts:

I want to follow up on that. I have heard a lot of confusion, and I think part of it is—I understand what you are trying to say when you say that it is not a new cost because you are essentially—you have lowered one piece of the rate structure in the volumetric rate and then have created this demand charge. But there is currently not a demand charge mechanism in residential and small-business bills, so I think there is a lot of confusion when we hear that it is not a new charge, but it is a new charge. We also see the average bill will go down, and I think the question my colleague was asking is—that means—usually, when there is an average, there will be—some will go down, some may go up—so is there any protection in place to ensure that residential customers will not see a bill increase as a result of this demand charge being implemented.

Exhibit I Legislative minutes page 11

Joint Interim Standing Committee on Growth and Infrastructure, April 21, 2026. Official minutes; selected original pages. Accessed November 5, 2026.

Source: https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/34209#page=11

Mr. Elicegui:

Thank you, Mr. Chairman. The short answer is, again, that the kilowatt-hour charge, for example, will be reduced by 1.8 cents. That is over a 10 percent reduction in the kilowatt-hour charge. The design of the entire rate is revenue-neutral for the company. Meaning that the company—the amount of revenue that the company is set to collect through its bills will not increase because of this charge. What is happening is that the demand charge itself reflects how the customers use energy, i.e., their highest 15-minute usage on each day. If they have a bad day, and usage—if a customer runs their air conditioning and loads it up at the same time with other appliances, that only impacts that day, and the very next day their daily demand is reset. It is based on the usage in that day—again, on how they use energy, not when they use energy.

Chair Watts:

Thank you. It sounds like there—again, we are using the law of averages here—so there is not a particular protection for individual customers. In the example you gave, if the general use pattern for a customer is—they come home in the summer; air conditioning is running all the time to try and keep the house comfortable; they pick up the kids; they get home; they do the laundry; they do the dishes; kids got the TV on; all the appliances are running; then basically they are going to have a high demand that triggers a larger daily demand charge. And if that happens most days, then they may be on the side of the average that actually sees higher bills, instead of lower bills. Is that a fair characterization?

Mr. Elicegui:

Chairman Watts, I think—two points. One, a customer who uses energy consistently throughout the day—it is what we call a higher load factor customer—they should actually see a reduction because, again, the kilowatt-hour charge goes down, so the volume of energy they are using—they are paying less for that amount.

With respect to protections, what I can say is that the Commission's order requires reporting to the Commission on an annual basis—requires the company to calculate whether customers—to randomly pull from customers and to see what their bill would have been and compare it to what their bill was. So, the protection lies in the Commission's ability to restructure rates as the company moves forward and to determine whether or not the results that the company predicted—that we will better charge customers for how they use energy—is actually a goal that is satisfied by the daily demand charge implementation in southern Nevada.

Chair Watts:

Thank you. It sounds like then, the protection would be that we would get data and potentially see that certain customers are facing higher bills, and then that would be something that would be addressed in a future rate case in a couple of years.

The one other thing you mentioned that is—you are working on deploying some modeling in public education. Again, I think one of the issues that I have heard a lot is no one knows what the impact of this is going to be. I have actually—I am familiar with the company. I have looked at your time-of-use calculator—I think it is a wonderful tool. Someone can go onto your website and put that information in, and it shows—it looks at their past usage and shows this is—looking back, this is what your bills would look like under a time-of-use rate. I have not seen anything like that deployed, so far, for the demand charge where people can make that side-by-side comparison. In the absence of that information, I think there is

Exhibit I Legislative minutes page 12

Joint Interim Standing Committee on Growth and Infrastructure, April 21, 2026. Official minutes; selected original pages. Accessed November 5, 2026.

Source: https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/34209#page=12

a lot of concern. I have seen there have actually been some grassroots efforts to develop a calculator for the demand charge itself that does not factor in the reduction in the volumetric charge—so this is a very complex kind of equation. I think it would be very helpful for people to be able to go on and see—again, very similar to the other calculators you have—based on their past usage patterns, what would that look like—what would their bills look like under this. Can you give us any information on when you plan to roll that out, so that customers can have some of that information?

Mr. Elicegui:

I appreciate the question, and thank you for it, Chairman. With respect to a bill calculator, that is a question I have asked the team. We do not have an answer at this point as to whether we will be able to develop and roll out a bill calculator. What I can tell you is that customers throughout the summer—we expect at least one in June and at least one later in the summer, and then the third communication in the fall where the customers will receive an as-billed comparison—that is how they were actually billed—and then a was-billed comparison—to what the bill would have looked like with a demand charge. So, it provides exactly that information you spoke about, Mr. Chairman. It implements, effectively, a shadow bill that shows the customer what the reduction in the volumetric rate would have done and what the demand—or the daily demand charge—would have done, recalculates the bill, and presents a side-by-side comparison for the customer. We expect three of those to roll out over the course of—two of those to roll out over the course of this summer and one to be rolled out in the fall—together with other information about how stacking of appliances affects daily demand and other activity that affects daily demand.

Chair Watts:

Thank you. I appreciate that. I will take the opportunity to say that I think that being able to roll out something that has kind of like a 12-month lookback would be something that would be very helpful, I think, based on what you have said. It could provide a lot of peace of mind to the average ratepayer. Then it could also get those who may see higher bills as a result—it would allow them to know that, to see what they can do—also to be engaged with us as lawmakers, the Public Utilities Commission, and others, so that we can be aware of what some of these impacts look like on the front end, especially since the implementation of this is now on a fairly long time horizon. It was originally planned to go into effect at the first of this month, and now we are looking at January 1st. I think that would be something that would be very useful. In addition to just the look-back, it would be helpful—and the generic information about appliances—it would be helpful to actually educate people on when their peak demand is on given days, even on average, so that people can understand, "Oh, in general, it is at 5 o'clock on this day when I see my energy use go up, and it goes up x percent," for example. I think those educational resources would be a great benefit to the community so that they can truly understand what the impact of this will be. Members, additional questions? Yes, Assemblymember Carter.

Assemblymember Carter:

Thank you very much. My District has a significant portion—a significant amount of lower income and senior citizens in my District. In fact, the area I live in, a lot of the houses were built in the '70s, and '80s, '90s, and that are with retired members like me—retired—that either built or bought their homes back then and are on a fixed income. Last month we heard a lot about cost shifting. What is going on with—is there a cost shifting going on in

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the residential world where those who are fortunate enough to be able to afford rooftop solar are getting a benefit that is being cost shifted down to the lower income and those who are on fixed incomes that are not able to afford to put rooftop solar on or are afraid of being scammed by so many of the problems we have seen in that industry?

Mr. Elicegui:

Thank you, Assemblyman Carter, for the question. The Public Utilities Commission's order in the last Nevada Power and Sierra Pacific rate case documented a cost shift caused by the installation of rooftop solar. That is precisely why the fair and responsible cost-sharing mechanism of 15-minute netting and daily demand were implemented. Those are both designed to ensure that the activity that drives the cost—for instance, peak demand associated with a customer generator—pay for the costs that activity drives. Short answer to your question is yes—the Commission concluded that costs were shifted based on a presentation made by NV Energy and took action to have a more fair, and responsible, and equitable cost-sharing mechanism to drive more affordable rates for all customers.

Chair Watts:

Thank you. We will go next to Assemblymember Karris.

Assemblymember Karris:

Thank you, Chair. I would like to dig back into the peak demand and what it means because you mentioned behavior. I myself know that it saves me a great deal of money to run my dishwasher with the wonderful timers they have—at 1 in the morning, 2 in the morning—when businesses are not needing the massive load. So, I alleviate that and save myself a little bit. With this new peak demand—so then maybe my peak demand in the not summer months may be at 2 in the morning. How is that going to affect my bill? Am I now still seeing a savings by doing it when it is not needed by the massive amount we need in the high points of the day for air conditioning? Or is that now gone?

Mr. Elicegui:

Thank you for the question, Assemblyman [*sic*] Harris [*sic*]. That is precisely the type of activity and usage that the daily demand charge is intended to incentivize. So, not stacking an appliance, running your washing machine at 1 a.m., and not also running your dishwasher and your air conditioner at the same time should lead to bill reductions for customers because the volumetric rate will be reduced as that daily demand charge is introduced—and therefore your overall bill should see a reduction if your behavior, or how you use energy, aligns with the purpose of the daily demand charge, which is to drive activity to not be stacked upon each other and to other times of the day when the system is less congested. So, yeah, short answer is that activity is what we are trying to encourage, and we appreciate that, and I apologize for calling you Assemblyman [*sic*] Harris, Assemblyman [*sic*] Karris.

Chair Watts:

Thank you. I actually have a follow up question on that—because this demand charge is not based on time of use, it is based on peak demand at any time of the day. So, if that scenario is that somebody's dishwasher is running at 1 a.m. while their electric vehicle is charging, and the A/C [air conditioning] might kick on—which it has been known to do down here when the low, at 4 a.m., is in the 90s—that would basically contribute to a higher—potentially, that could be the point that triggers the demand charge—if some of

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those things are being moved off-peak—even though the market price overall for energy is lower because we are relying more on base generation and not that peak that we see in the evenings. Is that correct?

Mr. Elicegui:

Thank you, Chairman Watts. If activity is stacked—meaning if a customer—how the customer uses energy by stacking electric vehicle charging, with a washing machine, with an air conditioner, that will drive daily demand regardless of the hour of the day in which it occurs. So, the optimal solution for the customer and the grid—to ensure that the grid operates reliably and operates in the most efficient manner—is to not stack that activity and to stagger your electric vehicle charging, followed by the washing machine, followed by an air conditioner, so that they are not all occurring in the same 15-minute window.

Chair Watts:

Thank you. That is a lot of scheduling. Which actually brings me to a question related to the resource plan and some of the demand management. Do you have any—do you envision plans to essentially work with services that can help customers maximize these things, where they could sign up and essentially work with the utility to schedule out their smart appliances in order to maximize both the grid resiliency but also maximize the cost savings that individual properties could get under this scenario?

Mr. Elicegui:

The Demand Side Plan will have a $238 million budget. That will involve programs such as battery storage, demand, response, and—I call flexible load—but battery storage flexible load, school flexible load, home flexible load. Those are all designed to help customers structure their energy usage to produce 171 megawatts of flexible load savings for customers and, ultimately, to reduce customers' bills through participation in those programs, Chairman Watts.

Chair Watts:

Thank you. I guess my follow-up question is will some of those home programs, for example, be specifically tailored to assist customers that have various smart technologies to minimize the impact of the demand charge?

Mr. Elicegui:

Chairman Watts, I do not know the specific answer to that question—so that is one we can follow up on in writing, if that is acceptable.

Chair Watts:

Thank you. That would be great. Then the other question that I have that came from my colleague's question is can you describe the interaction of the demand charge with a customer that is already enrolled in time-of-use pricing?

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Mr. Elicegui:

I do not have the time-of-use pricing schedule memorized. What should happen in a revenue-neutral rate design is that as a daily demand charge is implemented, the volumetric rates for the various time-of-use periods should be altered, so that consumption in those time frames reflects the cost of energy in that time. But that is a question that I should also follow up in writing on.

Chair Watts:

Thank you. Again, I think that the issue is that right now those are pretty clear blocks of time, and so for folks that can see a benefit from that, they are moving and maybe stacking some of their energy use during those off-peak times, and that could actually lead to a higher demand charge and blunt some of the benefits that they get under a time-of-use policy—which, again, I think just points to how complex it is and how important it is that we get information out to people about these changes. Then can you describe particularly how this demand charge interacts with customers who are net metering with rooftop solar?

Mr. Elicegui:

Chairman Watts, I will do my best to do so. As rooftop solar production falls off and customer energy usage increases during the late afternoon and early evening hours, customers will see their demand—how they use energy—hit the grid. So, the interaction there is—as the demand charge takes place—you can go back to our slide—you will see the average monthly bill for a solar single-family residential customer will likely increase from $58 to $70. That is because—how they use the system—the cost that they are driving as their demand is pushed into the system—their bill now reflects that usage of the system.

Chair Watts:

Okay, so the average solar bill will go up. I think the thing I am trying to figure out is obviously, since they are generators, they could also try and shift some of their demand into periods when they are generating excess energy—but those times might also not be necessarily off-peak times. Do you have any sense of how that would work?

Mr. Elicegui:

I think—again—that, Chairman Watts, that is precisely the type of behavior or usage that the demand charge is intended to drive, specifically—ideally—for a solar residential customer. Using and stacking usage at a time when their generator is producing max output allows them to control their demand charge because the demand is served by the customer generator and is not relying on the grid.

Chair Watts:

But, for example, that could take a customer who may be charging their electric vehicle at night, and they are now going to charge their electric vehicle using some of the excess solar generation during the day, even though that is actually increasing overall demand on the grid—perhaps going all the way to 5 p.m. as we are starting to enter peak demand. Am I understanding that right?

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Mr. Elicegui:

Chairman Watts, the point being if the charging is scheduled with the maximum output of the solar generation, the demand does not push to the grid, i.e., they are just reducing excess energy that is pushed into the grid, and the electric vehicle demand is being satisfied by the customer generator, so it relieves the peak demand on the grid.

Chair Watts:

But then those are also electrons that cannot go and serve other customers, correct?

Mr. Elicegui:

Chairman Watts, yes, the utility will produce the energy that is needed to balance the load, that is, to ensure that generation is in balance with the load, and/or procure energy back to that 15-minute energy imbalance market. You know, there are periods of time when other utilities are pushing excess energy to the company. Sometimes that is negative-priced energy, and if a customer's usage is consistent with the grid's usage, not putting demand onto the grid, we have the ability to draw excess energy from our neighbors.

Chair Watts:

All right, thank you. I think one last question I have. I know that the utility proposed a low-income rate in its last rate case—as we discussed about trying to moderate the impacts of various programs on our low-income users. Can you speak to that briefly?

Mr. Elicegui:

I will do my best, Chairman Watts. The company did propose a low-income rate. It was not approved by the Commission. We are reevaluating low-income rate proposal for our next rate review proceeding, which will be in northern Nevada. Ideally—optimally—we would like to align that system with other funds and other options available to low-income customers to maximize the benefit of that system for low-income customers.

Chair Watts:

Thank you. We will go next to Assemblymember Carter.

Assemblymember Carter:

Thank you. We are bouncing around a bit, but I had a question regarding the demand side controls that you are talking about—implementing the programs and such. Right now, you know that there is—I have heard anecdotally—too many stories about using PowerShift and having somebody come out, put in a thermostat—a smart thermostat—and then get given a report, "This is what you need to do." And then going, "Okay, what do I do with this?"

I am concerned about effectiveness—to where it is more of a one-stop—to where—when somebody comes out to give an analysis that the upgrades that are needed—insulation, windows, whatever—is taken care of and scheduled at that time. Also that—and I see one of my very active constituents sitting back there, Ms. Prentice, who is very active with Make the Road and with CHISPA—and I am curious if NV Energy is considered partnering with organizations like that to take in—penetrate—my community. The reason I ask that is we are a very high percentage of English as a second language households, and we watched already low participation in our community allow I-11 to get plowed right through the center