26-04026

Public Utilities Commission of Nevada

Electronic Filing

Submitted: 6/22/2026 11:56:01 AM

Reference: db2155ba-95f0-4e6a-8df9-bb56c9d391f8

Payment Reference: 6a-8df9-bb56c9d391f8

Filed For: SV RNO Property Owner 1 LLC and PR RNO Property Owner 1 LLC

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

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
SV RNO Property Owner 1 LLC and PR RNO Property Owner 1 LLC

FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 6/22/2026

Davison Van Cleve PC
Attorneys at Law
(725) 735.1719 • crl@dvclaw.com

4675 W Teco Ave., Suite 230
Las Vegas, Nevada 89118

June 22, 2026

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

Re: Application of SV RNO Property Owner 1 LLC for a Permit to Construct the Proposed South Valley Generation Facility in Storey County, Nevada, under the provisions of the Utility Environmental Protection Act.
Docket No. 26-04026

Application of PR RNO Property Owner 1, LLC for a Permit to Construct the Peru Ridge Self-Generation Project, consisting of natural gas-fueled electrical generating facilities located in Storey County, Nevada, under the provisions of the Utility Environmental Protection Act.
Docket No. 26-04027

Dear Ms. Osborne:

Please find enclosed the Prepared Direct Testimony of Dennis Bartlett on behalf of SV RNO Property Owner 1, LLC and PR RNO Property Owner 1, LLC in the above-referenced dockets.

Sincerely,

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

Attorneys for SV RNO Property Owner 1, LLC and PR RNO Property Owner 1, LLC

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Application of SV RNO Property Owner 1 LLC for a Permit to Construct the Proposed South Valley Generation Facility in Storey County, Nevada, under the provisions of the Utility Environmental Protection Act.	Docket No. 26-04026
Application of PR RNO Property Owner 1, LLC for a Permit to Construct the Peru Ridge Self-Generation Project, consisting of natural gas-fueled electrical generating facilities located in Storey County, Nevada, under the provisions of the Utility Environmental Protection Act.	Docket No. 26-04027

PREPARED DIRECT TESTIMONY OF
DENNIS BARTLETT
ON BEHALF OF
SV RNO PROPERTY OWNER 1 LLC
AND
PR RNO PROPERTY OWNER 1, LLC

June 22, 2026

Q.1. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

A.1. My name is Dennis Bartlett. I am Vice President of Utility Development for Tract Capital Management, LP ("Tract"), the asset manager of various investment vehicles, including the applicants here: (1) SV RNO Property Owner 1 LLC, and (2) PR RNO Property Owner 1, LLC ("Applicants"). Applicants are both Delaware limited liability companies. My business address is 3200 Cherry Creek Drive South, Suite 700, Denver, Colorado, 80209

Q.2 PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL EXPERIENCE.

A.2. I hold a Bachelor of Science in Engineering, Master of Environmental Management, and Master of Business Administration Degrees from Duke University. I am a registered Professional Engineer. I have more than 15 years of professional experience across engineering, construction, and energy sectors. As most relevant to the contents of this testimony, I have spent over 8 years supporting data center energy needs at both Meta Platforms and Tract, where I have been responsible for several large load interconnections and energy supply arrangements as well as permitting obligations. My prior work represents several gigawatts of contracted load, ranging from public entities like cooperatives and federal power agencies to investor-owned utilities. More details regarding my professional background and experience are set forth in my Statement of Qualifications, attached as **Exhibit Bartlett – Direct-1.**

Q.3. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A.3. Yes, I testified previously in PUCN Docket Numbers 24-05041 and 25-09008.

Q.4. ON WHOSE BEHALF ARE YOU TESTIFYING TODAY?

A.4. I am testifying on behalf of Applicants. Throughout this testimony, I may refer to Applicants interchangeable as "Applicants" or "Fleet." Fleet Data Centers is the sole user of Applicant's proposed projects.

Q.5. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A.5. The primary purpose of my testimony is to express support for the Applicants' proposed projects identified in the above dockets, and particularly the scope of the environmental review already conducted and sufficient to satisfy the Commission's obligations and support the Commission's necessary findings. The two projects are: the South Valley Power Generation Facility ("South Valley Project"), which was filed in Docket No. 26-04026, and the Peru Ridge Self-Generation Project ("Peru Ridge Project"), which was filed in Docket No. 26-04027 (collectively with the South Valley Project, the "Projects") and provide an overview of Applicants' pending Applications for Permits to Construct under the Utility Environmental Protection Act ("Applications"), which were filed with the Public Utilities Commission of Nevada ("Commission") on April 16, 2026, and are the subjects of the above-identified dockets.

Q.6. PLEASE IDENTIFY AND DESCRIBE THE MAJOR EXHIBITS TO THE AMENDED APPLICATION.

A.6. The South Valley Project Application has one major exhibit central to my testimony: Exhibit F, the UEPA Environmental Statement ("South Valley ES"), prepared by Panorama Environmental, Inc. The Peru Ridge Project Application also has one major exhibit central to my testimony: Exhibit F, the UEPA Environmental Statement ("Peru Ridge ES"), similarly

prepared by Panorama Environmental, Inc. Both the South Valley ES and Peru Ridge ES fully analyze, consistent with Nevada's regulatory framework, and to the full extent necessary to inform the Commission and support the necessary findings for the Commission to issue the requested Permits, and also fully identify the probable environmental effects that may result from the construction and operation of the Projects.

Q.7. WHAT SPECIFIC RECOMMENDATION ARE YOU MAKING IN THIS CASE.

A.7. I recommend that the Commission rely on the submitted Applications, which include both the South Valley ES and Peru Ridge ES, and approve the Applications submitted by the Applicants to construct the Projects.

Q.8. PLEASE PROVIDE A GENERAL OVERVIEW OF THE FACILITIES AND THEIR OPERATION

A.8. The South Valley Project is a 144 MW nameplate natural gas power generation system, as fully described in the South Valley Project Application. The Peru Ridge Project is a 218 MW nameplate natural gas power generation system, as fully described in the Peru Ridge Project Application. Both Projects would be sited near an existing industrial park area (the Tahoe-Reno Industrial ("TRI") Center) and are consistent with the TRI Center's Master Plan, which authorizes siting of such facilities, consistent with Storey County's long-term industrial development objectives and land use policies. Both Projects are short-term in nature, and operations are anticipated to last two (2) to three (3) years (with authorized extensions, if necessary), while NV Energy brings additional, long-term infrastructure and capacity online to meet Fleet's energy needs. Both Projects would exclusively serve dedicated data center loads during this interim period and will not be grid-connected.

Q.9. DO THE APPLICATIONS PROPERLY DESCRIBE THE GENERATING FACILITIES' EFFECTS ON THE ENVIRONMENT AND THE BENEFITS TO THE STATE OF NEVADA?

A.9. Yes. Both Applications include (1) summaries of the Projects' probable effects on the environment during both construction and operation, and (2) detailed descriptions of the same in Exhibit F to each individual Application. Both Applications also describe the various benefits that the Projects will provide to the State. The Applications and Exhibits F both speak for themselves regarding those effects and benefits.

Q.10. WHAT ENVIRONMENTAL REVIEW HAS BEEN CONDUCTED?

A.10. Applicants have submitted thorough environmental review documents – the South Valley ES and the Peru Ridge ES – with their applications. As an initial matter, both the South Valley ES and Peru Ridge ES contain relevant information relied upon by other agencies when issuing permits – for example the Nevada Department of Environmental Protection ("NDEP") Class 1 OPTC Air Permit – and are sufficiently detailed that duplicative environmental studies are unnecessary. Second, under UEPA, the Applicants are responsible for providing the Commission with sufficient information regarding environmental assessment and probable environmental effects, in addition to specific agency approvals (*i.e.*, NDEP, Storey County, etc.). Under UEPA, the Commission's scope of environmental review is limited to scope of information provided by the applicant and as necessary to support the Commission's findings pursuant to NRS 704.890.[1] Here, Applicants have commissioned and submitted the detailed South Valley ES and Peru Ridge ES by a qualified environmental

[1] I am not an attorney, but understand that the Commission's review is limited to the requirements established in this statutory section.

consultant, which provide significant detail on each Project's probable environmental effects, demonstrate the necessary review by other state agencies, including NDEP, for other necessary permits, and identify all minimization and mitigation measures, and the multiple benefits each Project will provide to the State. In summary, the Applications stand on their own and each demonstrate independently that an approval from the Commission is warranted.

Q.11. DOES EACH PROJECT'S ENVIRONMENTAL STATEMENT MEET ALL STATUTORY CRITERIA?

A.11. Yes. While I am not an attorney, I understand that UEPA requires the Applicants to submit both a summary of environmental review that has been conducted for a project, as well as the full environmental review. The Applications include this necessary information in the body of the application (Section III.C of each) and Exhibit F. Additionally, UEPA requires that this Commission make findings regarding the Projects' "probable effect on the environment;" the Projects' balancing of any adverse environmental effects; and that the Projects "represent[] the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives."[2] Both the South Valley ES and the Peru Ridge ES provide more than adequate information to inform the Commission regarding potential and probable environmental effects across multiple environmental resources categories, and provide sufficient analysis and supporting for the Commission to make the necessary findings.

[2] NRS 704.890(1).

Q.12. WHAT ARE THE FINDINGS THAT THE COMMISSION MUST MAKE IN ORDER TO APPROVE THE UEPA PERMIT IN THIS DOCKET?

A.12. While I am not an attorney, it is my understanding that in order to grant a UEPA permit, the Commission must make the findings specified in NRS 704.890(1) and which include:

(a) The nature of the probable effect on the environment;

(b) If the utility facility emits greenhouse gases and does not use renewable energy as its primary source of energy to generate electricity, the extent to which the facility is needed to ensure reliable utility service to customers in this State;

(c) That the need for the facility balances any adverse effect on the environment;

(d) That the facility represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives;

(e) That the location of the facility as proposed conforms to applicable state and local laws and regulations issued thereunder and the applicant has obtained, or is in the process of obtaining, all other permits, licenses, and approvals required by federal, state, and local statutes, regulations, and ordinances; and

(f) That the surplus asset retirement plan is adequate under the statutory conditions; and

(g) That the facility will serve the public interest.

In support of the Applications, my testimony provides confirmation that the Applications include all information necessary for the Commission to make these findings.

Q. 13. PLEASE EXPLAIN WHY THE COMMISSION CAN MAKE THE REQUIRED FINDINGS REGARDING THE NATURE OF THE PROBABLE EFFECT ON THE ENVIRONMENT.

A.13. Here, both Projects provide detailed evaluations of the probable environmental effects in each Application's Exhibit F. The environmental review in each Application speaks for itself, and provides detailed analysis regarding probable environmental impacts to, or associated with: (1) geology, soils, and paleontology; (2) water resources; (3); air quality; (4) biological resources; (5) cultural resources; (6) land uses; (7) transportation; (8) visual resources; (9) noise; (10) waste management and hazardous materials; (11) socioeconomics; and (12) fire management. Regarding the Projects' probable effects on the environment, such effects are generally temporally limited to construction period (*e.g.*, dust) and long-term effects are further limited by the relatively short duration of operation (estimated at three years). Accordingly, the Projects will not have significant unmitigated impacts on the environment. As described in detail in each Project's ES, the various, probable effects on environmental resources will not be significant and are capable of being mitigated by compliance with best management practices and NDEP or local agency-required permit terms and conditions, where applicable. As an example of BMPs, all power generation will be controlled using state-of-the-art pollution controls that are capable of meeting the strictest emissions limitations for nitrogen oxides ("NO_x"), carbon monoxide ("CO"), and volatile organic compounds ("VOCs") for any applicable standards under both NDEP and United States Environmental Protection Agency ("EPA") regulatory frameworks. Neither Project's construction or operation would result in significant impacts to soil, air, water, cultural, biological, or other resources.

Q.14. PLEASE EXPLAIN WHY THE COMMISSION CAN MAKE THE FINDINGS REGARDING THE PROJECTS' BALANCING OF NEED AND ADVERSE EFFECTS ON THE ENVIRONMENT.

A.14. Applicants have supplied information on alternatives in each Project's Application, and evaluate potential alternatives for the placement of power generation facilities within and near both the South Valley and Peru Ridge sites. The need for the Projects is provided in both Applications: to ensure adequate load service while NV Energy brings additional, permanent utility infrastructure and capacity into service. Moreover, for both Projects, the selected locations minimize environmental impacts by being co-located with the loads being served, being located in and on land already designated and developed for industrial uses and on land which has been cleared and graded, and used only for data center purposes. Further environmental impacts will be mitigated through use of state-of-the-art air pollution and emission controls, which are objectively the best available technology, the implementation of standard best management practices ("BMPs") and other standard permit terms and conditions (for example, stormwater permits). Accordingly, all temporary construction impacts will be appropriately and sufficiently minimized and mitigated. Additional environmental effects will be mitigated by the Projects' anticipated short operational duration and are acceptable given the balance of the Projects' technological requirements, limitations, and economic benefits. Air pollution impacts are acceptable because the project emissions, along with other nearby emission sources, are required to pass very stringent dispersion modeling analyses that are inherently conservative, to show that the area will continue to meet all applicable state and federal regulatory standards. Applicants completed those analyses, which show compliance with the necessary modeling standards, and are included in

Exhibit F to each Application. Accordingly, the Projects' identified minimization and mitigation measures adequately balance any probable adverse environmental effects with the Projects' need.

Q.15 PLEASE EXPLAIN WHY THE COMMISSION CAN MAKE THE REQUIRED FINDING THAT THE PROPOSED FACILITY REPRESENTS THE MINIMUM ADERSE EFFECT ON THE ENVIRONMENT, CONSIDERING THE STATE OF AVAILABLE TECHNOLOGY AND THE NATURE AND ECONOMICS OF THE VARIOUS ALTERNATIVES.

A.15. Applicants have described the efforts taken to minimize the environmental impacts in both the Projects' Applications and the two ES documents. As an initial matter, the Projects are located within heavy industrial areas, where surrounding land uses are primarily existing industrial facilities, including existing large-scale power generation, or un-or-under-developed mountainous terrain. Sensitive land uses – such as residences or schools – are located a significant distance (greater than 4.5 miles) from the Projects. The Projects' locations have also been subject to previous leveling and grading for non-public utility uses, thereby reducing the necessary ground disturbances to a minimum. Additionally, the Projects will include a comprehensive suite of environmental controls during both construction and operation and comply with all necessary terms and conditions of the various permits required by NDEP. Finally, long-term environmental impacts are balanced by the Projects' anticipated short-term nature – an expected duration of two (2) to three (3) years.

Q.16. PLEASE EXPLAIN WHY THE COMMISSION CAN MAKE THE REQUIRED FINDING THAT THE LOCATION OF THE FACILITY AS PROPOSED CONFORM TO APPLICABLE STATE AND LOCAL LAWS AND REGULATIONS ISSUED

THEREUNDER AND THE APPLICANT HAS OBTAINED, OR IS IN THE PROCESS OF OBTAINING, ALL OTHER PERMITS, LICENSES, AND APPROVALS REQUIRED BY FEDERAL, STATE, AND LOCAL STATUTES, REGULATIONS, AND ORDINANCES.

A.16. Both Projects will be located in or near the TRI Center, and within the TRI Center's Master Plan area, which is a dedicated industrial park, zoned for industrial uses, and consistent with Storey County's land use planning. Both Projects' Applications include the additional necessary permits, including Surface Area Disturbance Permits, Construction Stormwater Permits, and air permits, all issued by NDEP (and the Bureau of Air Pollution Control, where applicable), as well as building permits issued by Storey County.

Q.17. PLEASE SUMMARIZE APPLICANTS' REQUEST TO THE COMMISSION?

A.17. Applicants request that the Commission approve the Applications. Applicants have provided complete and detailed Applications and studies relating to the Projects' probable impacts on the environment. Those studies disclose that the Projects will not have significant, unmitigated impacts on the environment, and provide more than sufficient information and data to support the Commission's necessary findings. Accordingly, I recommend that the Commission approve the Applications and permit Applicants to construct and operate the Projects.

Q.18. DOES THIS CONCLUDE YOUR TESTIMONY?

A.18. Yes, however, I reserve the right to supplement or make corrections to this testimony in the hearing in this proceeding, as may be necessary.

EXHIBIT BARTLETT – DIRECT - 1

STATEMENT OF QUALIFICATIONS OF

Dennis M. Bartlett PE
Vice President, Utility Development
Tract Capital Management, LP
3300 E 1st Ave.
Denver, CO 80206
(303) 276-7950
Dennis.Bartlett@Tract.com

PROFESSIONAL EXPERIENCE

2023-present **Tract Capital Management** ***VP, Utility Development***

Data center site selection and utility-facing commercial arrangements focused on western United States.

2021 to 2023 **Meta Platforms** ***Energy Manager***

Data center site selection and energy supply contracting across several geographies and market structures. Procurement of customer-dedicated resources in support of voluntary renewable energy commitments via green tariffs. Regulatory support related to interconnection, green tariff, general rate case, fuel cost rate case, and customer-dedicated resource procurement.

2017 to 2021 **Meta Platforms** ***Energy Project Manager***

High voltage interconnection for large loads (data centers) representing 1GW+ of capacity worldwide. Engagement with municipalities, cooperatives, investor-owned utilities, and federal power authorities. Interconnection contracting and project management to successful delivery, including cost sharing/recovery arrangements and ancillary utility agreements (ROW/reality, security/access, credit support, operations agreements, etc.). Sustainability/circularity initiatives related to lithium ion battery re-use at data centers.

2008 to 2014 **DPR Construction** ***Project Engineer***

Contract issuance, scheduling, design coordination, risk management, and project cost accounting for large commercial and industrial construction projects.

EDUCATION

Duke University – Durham, NC

Master of Business Administration – 2017

Duke University – Durham, NC

Master of Environmental Management – 2017

Duke University – Durham, NC

Bachelor of Science in Engineering – 2008

QUALIFICATIONS

Professional Engineer (CA) - #M36515

AFFIRMATION

I, Dennis Bartlett, do hereby swear under penalty of perjury the following:

That I am the person identified in the foregoing Direct Testimony and that such testimony was prepared by me or under my direct supervision; that the answers and information set forth therein are true to the best of my knowledge and belief as of the date of this Affirmation; that I have reviewed and approved any modifications after the date of this Affirmation; and that if asked the same questions set forth herein, my answers would, under oath, be the same.

/s/ Dennis Bartlett

Dennis Bartlett

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Prepared Direct Testimony of Dennis Bartlett on behalf of SV RNO Property Owner 1, LLC and PR RNO Property Owner 1, LLC upon each of the parties on the attached service list in this proceeding via electronic mail.

DATED this 22nd day of June, 2026.

/s/ Dakota L. Councilman
Dakota L. Councilman
Attorney

Staff Counsel
Public Utilities Commission of Nevada
1150 E. William St.
Carson City, NV 89701
pucn.sc@puc.nv.gov

Don Lomoljo
Public Utilities Commission of Nevada
1150 E. William St.
Carson City, NV 89701
dlomoljo@puc.nv.gov

George Cavros
Western Resource Advocates
275 Hill Street, Suite 210
Reno, NV 89501
George.cavros@westernresources.org