26-06033

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PUBLIC UTILITIES COMMISSION OF NEVADA
Docket No. 26-06033

Prepared Direct Testimony of
Karen R. Olesky on behalf of the
Regulatory Operations Staff

1. Q. Please state your name, occupation, and business address.

A. My name is Karen R. Olesky. I am a Regulatory Economist for the Regulatory Operations Staff ("Staff") of the Public Utilities Commission of Nevada ("Commission"). My business address is 9075 W. Diablo Drive, Suite 250, Las Vegas, Nevada 89148.

2. Q. Does Attachment KRO-1 summarize your professional background?

A. Yes, it does.

3. Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide Staff's recommendations concerning the Application of Nevada Power Company d/b/a NV Energy ("Nevada Power" or a "Company") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra" or a "Company" and together with Nevada Power, "NV Energy" or "Companies") for Approval of their Joint Expanded Solar Access Program ("ESAP") Implementation Plan ("ESAP Implementation Plan") for plan period 2027-2029.

4. Q. What are your recommendations to the Commission regarding the issues outlined in Question and Answer ("Q&A") 3?

A. I recommend that the Commission:

1) Deny Prayer for Relief 5 or alternatively, order NV Energy to file an errata fixing the request in its Prayer for Relief 5;

2) Determine that NV Energy cannot request approval of a community based solar resource ("CBSR") until the draft regulation pending in Docket No. 25-07004 is approved by the Commission, and the Commission-approved regulations are utilized in the CBSR host site selection and scoring process;

3) Remove the participation requirement that an eligible premises must have a

minimum of eight months consumption history, so that low-income customers who have less consumption history are not barred from participating in the ESAP; and

4) Amend the ESAP application form to clearly state that an applicant only needs to provide one type of documentation to verify their eligibility.

I. Recommendation No. 1: Deny Prayer for Relief 5 or alternatively, order NV Energy to file an errata fixing the request in its Prayers for Relief 5.

5. Q. What does Prayer for Relief 5 state?

A. NV Energy requests that the Commission "Grant[] all other requests as are specifically set forth in the exhibits filed herewith, those that are directly addressed and those that are not directly addressed in this Application[.]"[1] (emphasis added)

6. Q. Please state why you recommend denying Prayer for Relief 5.

A. I do not believe the Commission can or should give NV Energy approval for requests that are not directly addressed in the Application, and the portion of Prayer for Relief 5 underlined in the previous Q&A should be removed. If the Commission were to approve Pray for Relief 5 as is, it is essentially giving blanket approval to unknown requests, and Staff (and the Commission) would have to wait until the next ESAP Implemental Plan or ESAP Amendment is filed to address any ESAP changes that made that were not specifically spelled out in the Application.

7. Q. What is your recommendation with regard to Prayer for Relief 5?

A. I recommend that the Commission either explicitly deny Prayer for Relief 5 or require Prayer for Relief 5 be modified via errata to request that the Commission "Grant[] all other requests as are specifically set forth in the exhibits filed herewith, those that are directly addressed in this application." If Prayer for Relief 5 is not explicitly denied, the Commission should not approve the ESAP Application until such errata is filed.

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[1] ESAP Application at 8.

II. Recommendation No. 2: Determine that NV Energy cannot request approval of a CBSR until the draft regulation pending in Docket No. 25-07004 is approved by the Commission, and the Commission-approved regulation is utilized in the CBSR host site selection and scoring process.

8. Q. What is Docket No. 25-07004?

A. On July 1, 2025, the Commission opened a rulemaking, designated as Docket No. 25-07004, to amend, adopt, and/or repeal regulations in accordance with Assembly Bill ("AB") 458 (2025). AB 458 (2025) Section 17(2)(c)(1-3) states that the Commission shall adopt regulations establishing standards for the ESAP, and the regulations must: For community-based solar resources: (1) require a process for open bidding or requests for proposals for the selection of sites for community-based solar resources; (2) prioritize the selection of sites for community-based solar resources that provide resiliency for the electric grid and benefits for the community; and (3) require construction of additional community-based solar resources in proportion to increased participation in the expanded solar access program.

Additionally, Section 17(1) amended the ESAP so that an electric utility shall offer an expanded access program solely to low-income eligible customers, and Section 17(2)(o), which allocated ESAP capacity between low-income eligible customers, disadvantaged businesses and nonprofit organizations, and customers who cannot install cost resources on their premises, was removed so that the ESAP capacity is now fully allocated to low-income eligible customers.

9. Q. Please provide an update on the status of Docket No. 25-07004 and the development of a regulation in accordance with AB 458 (2025).

A. On September 15, 2026, the Commission issued a Notice that the Commission scheduled a public workshop and hearing to solicit comments from all interested persons and for them to present their views regarding the proposed regulation, to be held on October 13, 2026, and October 20, 2026, respectively.

10. Q. Does the proposed regulation attached to the September 19, 2026, Notice change how CBSR host sites are selected?

A. Yes. The regulation was drafted to enact Section 17(2)(c)(1-3). The proposed regulation at Section 4(6) lists the criteria an electric utility shall use to prepare a shortlist of CBSR host sites. The draft regulation currently states:

> From the responses to a request for proposals for host sites for new community based solar resources, an electric utility shall prepare a shortlist of bids using the following criteria, without limitation: (a) Whether there is sufficient capacity on the distribution grid of the electric utility to accommodate a community-based solar resource on the host site without adversely impacting safety, power quality, reliability or other operational criteria; (b) Whether building a community-based solar resource on the host site would introduce additional constraints on the distribution grid of the electric utility; (c) Whether the developer of the community-based solar resource has affirmed that all necessary permits can be obtained to build the community-based solar resource on the host site; (d) Whether the host site has a higher solar output as compared to the other host sites for which bids were received; and (e) Whether the host site is a premises that contains a business which serves a significant population of low-income individuals, including, without limitation, a homeless shelter, food bank or low-income health clinic.

11. Q. Are the site selection criteria written in the proposed regulation included in the ESAP Implementation Plan?

A. Partially. NV Energy states that it reviewed the proposed regulation in Docket No. 25-07004 and believes the proposed CBSR process is generally consistent with those requirements, and that to the extent the final regulation adopted in Docket No. 25-07004 differs from the current proposed regulation, it would modify Table 10 and the site selection criteria as necessary to ensure compliance.[2]

12. Q. Considering that the pending regulation has not been approved by the Commission, why are you recommending that it be incorporated in the ESAP?

A. Staff does not take issue with the fact that NV Energy elected to use the existing regulations to create the ESAP Implementation Plan, as they are the regulations that

[2] *See* Attachment KRO-2, NV Energy's Response to Staff Data Request ("DR") 10.

are currently approved, and NV Energy had no way of knowing when the Commission would hold a workshop and hearing on the proposed AB 458 (2025) regulation when it created its ESAP Implementation Plan. The ESAP Implementation Plan was filed on June 30, 2026, which was several months before the Commission filed its Notice in Docket No. 25-07004. However, since the Notice has been filed and there is a strong likelihood that the Commission could approve the pending regulation in the near future, it is logical to incorporate the Commission-approved regulation into the three-year ESAP Implementation Plan, instead of waiting until the next three-year ESAP is filed to make sure such host site selection criteria is utilized. As such, NV Energy should hold off on issuing a request for proposal and selecting a CBSR host site(s) until after the Commission approves the pending regulation so that it can ensure that the Commission approved selection criteria is utilized.

13. Q. What is your recommendation with regard to the draft regulation pending in Docket No. 25-07004?

A. While I appreciate that NV Energy filed the ESAP Implementation Plan with a CBSR process that is generally consistent with the proposed regulation, out of an abundance of caution, I recommend that no CBSR resources can be filed for approval with the Commission until the Commission-approved regulation can be fully incorporated into the program and utilized to select the CBSR host site(s).

III. <u>Recommendation No. 3: Remove the participation requirement that an eligible premises must have a minimum of eight months consumption history, so that low-income customers who have less consumption history are not barred from participating in the ESAP.</u>

14. Q. Does the ESAP have a capacity limit?

A. Yes. Nevada Revised Statutes 704.7865 (1) states that "an electric utility shall offer an expanded solar access program to low-income eligible customers within its service area in accordance with the provisions of this section. The size of the expanded solar

access program must not exceed: (a) For an electric utility that primarily serves densely populated counties, a total capacity of 240,000 megawatt-hours; and (b) For an electric utility that primarily serves less densely populated counties, a total capacity of 160,000 megawatt-hours."

15. Q. Do you have any concerns with the applicant eligibility criteria?

A. Yes, I do. NV Energy states that it will require any eligible premises to have a minimum of eight months' consumption history.[3] In other words, a customer that has recently moved into NV Energy's service territory, or moved out of housing where someone else was the customer of record on the electric bill into a place of their own and are establishing their electric service for the first time, (i.e., moving out of a parent's or roommate's place of residence to their own residence) would not be able to participate in the ESAP.

16. Q. Why does NV Energy require a potential applicant to have eight months' consumption history?

A. NV Energy states that to properly monitor the capacity amounts, requiring eight months' consumption history will allow for a more accurate average to be populated for eligible applicants, and this will then serve as the capacity reservation for the ESAP year.[4] NV Energy adds that the accuracy of participant capacity reservations helps ensure that applicable ESAP capacity limits are not exceeded.[5]

17. Q. Please explain why you are recommending removing this requirement.

A. I appreciate that NV Energy is diligently monitoring the capacity reservations and ensuring that the statutory limits are not exceeded. However, AB 458 (2025) reallocated the ESAP's entire capacity to low-income eligible customers. Prior to AB 458 (2025) the low-income eligible category capacity was limited to 60,000 megawatt-hours ("MWhs") for Nevada Power and 40,000 MWh for Sierra. Now the

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[3] ESAP Implementation Plan at 6.
[4] *Id.* at 6.
[5] *See* KRO-3, NV Energy's Response to Staff DR 11.

full ESAP capacity of 240,000 MWh and 160,000 MWh are available for Nevada Power's and Sierra's low-income eligible customers, respectively.[6] The eight months' requirement was implemented to get a more accurate understanding of how much capacity each applicant would need to ensure that the caps are not exceeded. However, since there is now four times as much total capacity for each Company, the concern that either Company will hit their capacity cap in the near term has been greatly reduced. Therefore, more flexibility can temporarily be introduced to allow applicants with less than eight months of consumption history to participate, because even if the amount of capacity estimated at the time an applicant is accepted into the ESAP turns out to be much lower than their actual consumption based on multiple months of usage, such 'overage' should be able to be absorbed by the available capacity without concern that it will cause either Company to exceed their capacity cap.

18. Q. Why did you say more flexibility can temporarily be introduced to allow applicants with less than eight months of consumption history to participate?

A. While there is an abundance of available capacity today, if there comes a point in time where there is limited capacity available, if NV Energy so desires, it could reinstate the requirement to have eight months of consumption history to resume having a more accurate capacity reservation to ensure that it does not go over the statutory limit. For example, the eighth months' consumption history requirement could be reinstated once 85 percent of a Company's available capacity has been requested.

19. Q. What is your recommendation in regard to the requirement that an applicant must provide eight months of consumption history?

A. I recommend that NV Energy remove the requirement that an applicant much have eight months consumption history. If NV Energy chooses so, I would support NV Energy being able to reinstate this requirement when a Company has reserved 85 percent of its total allocated capacity.

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[6] Docket No. 25-07004, Notice dated September 15, 2026, Draft Proposed Regulations at Section 3.

IV. Recommendation No. 4: Amend the ESAP application form to clearly state that an applicant only needs to provide one type of documentation to verify their eligibility.

20. Q. What is the ESAP low-income eligibility criteria?

A. NV Energy states that "The eligibility for low-income eligible customers requires applicants to demonstrate a household income of not more than 80 percent of the area median income based on the guidelines published by the U.S. Department of Housing and Urban Development[,]" that "Applicants must provide documentation evidencing that they receive one of the following [public program] benefits…" and that "Applicants can also provide documentation from any other state, county, or local governmental or nonprofit organization that can demonstrate the applicant has an income of not more than 80 percent of the area median income based on the guidelines published by the Department of Housing and Urban Development."[7] (emphasis added)

21. Q. What does the ESAP low-income application form state?

A. It states that a low-income eligible customer is "a household income of not more than 80 percent of the area median income and provide current documentation of one of the following [public program benefits]…."[8] (emphasis added)

22. Q. Based on your past experience with the ESAP, what is your understanding of the intent of having two different types of documentation to verify eligibility?

A. It is my understanding that the two forms of documentation to verify ESAP eligibility are supposed to be used interchangeably, and that an applicant only needs to provide one of the two acceptable types of documentation.[9] In other words, it is not a requirement that an applicant must provide documentation evidencing that they receive one of the public program benefits, but instead an applicant may provide such documentation or provide documentation that demonstrates they have an income of not more than 80 percent of the area median income.

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7 ESAP Implementation Plan at 7.
8 *Id.* at Appendix B.
9 *See* Attachment KRO-4, NV Energy's Response to Staff DR 12.

23. Q. What is your recommendation in regard to the low-income application form?

A. I recommend that the application form is amended to clarify that an applicant only needs to provide one of the two types of documentation to verify their ESAP eligibility, and not both.

24. Q. Please summarize your recommendations.

A. I recommend that the Commission:

1) Deny Prayer for Relief 5, or alternatively, order NV Energy to file an errata fixing the request in Prayer for Relief 5;

2) Determine that no CBSR can be a presented to the Commission for approval until the draft regulation pending in Docket No. 25-07004 is approved by the Commission, and the Commission-approved regulations are utilized in the CBSR host site selection and scoring process;

3) Remove the participation requirement that an eligible premises must have a minimum of eight months consumption history, so that low-income customers who have less consumption history are not barred from participating in the ESAP; and

4) Amend the ESAP application form to clearly state that an applicant only needs to provide one type of documentation to verify their eligibility.

25. Q. Does this conclude your testimony?

A. Yes, it does.

Karen Olesky

Statement of Qualifications

EDUCATION

Master of Environmental Management, Duke University, May 2008
Environmental Economics and Policy, focus in Energy
Master's Thesis: Nuclear Power's Emission Reduction Potential in Utah

Bachelor of Science in Marine Science, with Honors, Coastal Carolina University, May 2005

EXPERIENCE

Public Utilities Commission of Nevada, Las Vegas, Nevada
Economist, Resource and Market Analysis Division, June 2013 – present

Provide written and oral testimony before the Commission as an expert witness on renewable energy, energy storage, distributed energy resources, distribution planning, and resource planning. Participate in investigations and rulemakings to develop regulations, modernize utility programs, and assess resource adequacy.

Policy Advisor, March 2010 – June 2013

Analyzed public utility filings and intervenor recommendations for the purpose of advising the Presiding Officer. Assisted in drafting Commission Orders. Provided policy, technical support and advice to the Commissioners on various aspects of utility issues, particularly on renewable energy issues. Evaluated, analyzed, and interpreted utility data, applications, reports and plans for technical accuracy and consistency with Nevada Revised Statutes and Commission regulations.

American Electric Power, Columbus, Ohio
Strategic Policy Analyst intern, June 2007-August 2007

Analyzed policy positions for one of the largest electric utilities in the U.S. Interpreted prospective state and federal greenhouse gas legislation to assess the legislation's potential impacts on the company's generation fleet, which includes coal-fueled, natural gas, and nuclear power plants and wind, hydro, pumped storage and other renewable generation sources. Endorsed favorable legislation to other Utility Policy Analysts and briefed senior management on global climate change science.

MEMBERSHIPS

National Association of Regulatory Utility Commissioners, Washington D.C.
Energy Resources and the Environment
Chair Staff Subcommittee, January 2015 – Present

Identify and prepare presentation topics for educational panels for the Subcommittee and Committee. Establish a dialogue with state regulators to discuss ways to provide utility customers with environmentally sustainable and affordable energy services. Coordinate collaboration between NARUC committees to reinforce the importance of environmental

concerns in all areas of electricity. Actively discuss how to include equity issues when developing clean energy programs and policies.

Vice-Chair Staff Subcommittee, January 2013 – January 2015
Draft educational panel abstracts, engage presentation speakers, review and distribute power point presentations. Participate in monthly leadership telephonic conferences to focus the committee's activities on areas of interest that are timely and topical, and that further the committee's mission.

Member Staff Subcommittee, October 2010 – December 2019
Educated subcommittee members on Nevada's renewable energy, energy efficiency and demand response programs, obstacles and goals.

National Association of Regulatory Utility Commissioners, Washington, DC
Task Force on Environmental Regulation and Generation
Member, February 2012 – March 2016
Assist in educating NARUC committee members regarding U.S. EPA proposed regulations and relevant FERC matters through telephonic and in-person meetings.

Peak Reliability, Vancouver, Washington
Peak Member Advisory Committee, Class 5, June 2017 – December 3, 2019
Provide recommendations and input to the Peak Board from the Class 5 members (representatives of State and Provincial Governments) on issues related to enhancing reliability for electricity customers in the Western Interconnection.

ACKNOWLEDGEMENTS IN PEER REVIEWED PAPERS

Sara Baldwin, Ric O'Connell, Curt Volkmann. *A Playbook for Modernizing the Distribution Grid; Volume I: Grid Modernization Goals, Principles and Plan Evaluation Checklist.* IREC and GridLab. May 2020.

David Hoppock, Dalia Patino Echeverri, and Sarah Adair. *Assessing the Risk of Utility Investments in a Least-Cost-Planning Framework.* NI WP 13-07. Durham, NC: Duke University. 2013.

Tom Stanton. *Review of State Net Energy Metering and Successor Rate Designs.* National Regulatory Research Institute, Report No. 19-01, March 2019.

Tom Stanton, Kathryn Kline, *The Ecology of Community Solar Gardening: A 'Companion Planting' Guide.* National Regulatory Research Institute, Report No. 16-07, August 2016.

Tom Stanton. *Distributed Energy Resources: Status Report on Evaluating Proposals and Practices for Electric Utility Rate Design.* National Regulatory Research Institute, Report No. 15-08, October 2015.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	26-06033	**REQUEST DATE:**	09-23-2026
REQUEST NO:	Staff 10	**KEYWORD:**	Proposed Regs
REQUESTER:	Olesky	**RESPONDER:**	Bilberry, Jared (NV Energy)

REQUEST:

Reference: Proposed Regs

Question: The Plan at page 19 shows Table 10: CBSR Schedule, and page 20 lists site selection and scoring criteria. Please state how the ESAP for Plan Period 2027-2029 plans to incorporate the regulations being drafted in Docket No. 25-07004 for AB 458 (2025), particularly how it would change the steps in Table 10 and the entirety of the site selection criteria.

RESPONSE CONFIDENTIAL (yes or no): No.

TOTAL NUMBER OF ATTACHMENTS: None.

RESPONSE:

The Companies reviewed the proposed regulations in Docket No. 25-07004 and believe the proposed CBSR process is generally consistent with those requirements. Accordingly, the Companies do not currently anticipate changes to the steps set forth in Table 10 or significant changes to the overall site selection framework. The proposed process already includes a nomination period, site evaluation and scoring process, shortlisting, public voting, site selection, and competitive procurement through an Engineering, Procurement, and Construction ("EPC") Request for Proposal ("RFP"), which is consistent with the proposed regulations' requirements for an open and transparent process for identifying host sites, preparing a shortlist of bids, and selecting host sites for community-based solar resources.

The proposed scoring criteria also incorporate considerations reflected in the proposed regulations. Specifically, Site Location (25%) prioritizes sites located in disadvantaged and low-income communities using environmental and demographic indicators and is consistent with the proposed regulations' emphasis on locations serving low-income communities. Site

Characteristics (15%) and Site Control (5%) evaluate factors including solar production potential, site feasibility, and the ability to obtain necessary permits. Grid Benefits/Interconnection (25%) evaluates hosting capacity, interconnection requirements, grid reliability, resiliency, and potential distribution system benefits. In addition, Other Community Services or Benefits (5%) and Statement of Support (5%) incorporate community-benefit considerations consistent with the proposed regulations' emphasis on locations serving low-income individuals and providing community benefits. Notably, the Grid Benefits category was increased from 15 percent in the prior CBSR selection process to 25 percent in the proposed framework, further emphasizing grid-related benefits in site evaluation.

Accordingly, the Companies believe the proposed process already incorporates the concepts reflected in the proposed regulations, including an open and transparent site-selection process, prioritization of low-income communities, consideration of grid reliability and resiliency benefits, permitability, solar production characteristics, and community benefits. To the extent final regulations adopted in Docket No. 25-07004 differ from the current proposed regulations, the Companies would modify Table 10 and the site selection criteria as necessary to ensure compliance.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	26-06033	**REQUEST DATE:**	09-23-2026
REQUEST NO:	Staff 11	**KEYWORD:**	Participant Requirements
REQUESTER:	Olesky	**RESPONDER:**	Bilberry, Jared (NV Energy)

REQUEST:

Reference: Participant Requirements

Question: The Plan at page 6 states that to properly monitor the capacity amounts, the Companies will require an eligible premises to have a minimum of eight months consumption history to allow for a more accurate average to be populated for eligible applicants. 1. Please state when this requirement was added to the ESAP. 2. Please state how the period of eight months was established. 3. Please state why this was requirement was added. 4. Please state why NV Energy believes that is it appropriate to prevent customers who have recently moved and not resided in their residence for at least 8 months from participating in the ESAP.

RESPONSE CONFIDENTIAL (yes or no): No.

TOTAL NUMBER OF ATTACHMENTS: None.

RESPONSE:

1. The requirement for an eligible premise to have a minimum of eight months of consumption history was included in the Companies' 2021 ESAP Implementation Plan (Docket No. 20-12003) and has been carried forward in subsequent ESAP plans for 2024-2026 and 2027-2029. The requirement was included as part of the Companies' process for monitoring ESAP capacity amounts and establishing participant capacity reservations.

2. The Companies established the eight-month consumption history requirement to provide sufficient historical usage data to develop a representative average consumption value for eligible applicants. The average consumption value is then used to establish the participant's capacity reservation for the ESAP year.

3. The requirement was added to support administration of ESAP capacity limits. The Companies use historical consumption data to estimate a participant's annual electricity usage and establish a corresponding capacity reservation amount. Requiring a minimum of eight months of consumption history allows the Companies to calculate a more accurate average consumption value and monitor available program capacity.

4. The eight-month consumption history requirement was not established as a residency requirement. Rather, the requirement was established to provide sufficient consumption history to calculate a representative average consumption value for ESAP participants. That average consumption value serves as the participant's capacity reservation for the ESAP year and supports monitoring of available ESAP capacity. The Companies included the requirement to improve the accuracy of participant capacity reservations and help ensure that applicable ESAP capacity limits are not exceeded.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	26-06033	**REQUEST DATE:**	09-23-2026
REQUEST NO:	Staff 12	**KEYWORD:**	Customer Eligibility
REQUESTER:	Olesky	**RESPONDER:**	Bilberry, Jared (NV Energy)

REQUEST:

Reference: Customer Eligibility

Question: The Plan at page 7 states that applicants must provide documentation evidencing that they receive one of the following benefits, and lists 10 programs. The Plan at page 7 goes on to state that Applicants can also provide documentation from any other state, county, or local government or non-profit organization that can demonstrate the applicant has an income of not more than 80 percent of the area median income based on the guidelines published by the Department of Housing and Urban Development. Regarding the requirement that applicants must provide evidence of receiving benefits:
1. Please state when this requirement was added to the ESAP.
2. Please state why this requirement was added. Regarding both statements of the Plan read together:
3. Please explain if an applicant who provides documentation from any other state, county, or local government or non-profit organization that can demonstrate the applicant has an income of not more than 80 percent of the area median income ALSO must provide documentation evidencing that they receive one of the following benefits, or if the requirement to participate is to EITHER show documentation that an application receives benefits OR an documentation that an application meets the median income threshold.

RESPONSE CONFIDENTIAL (yes or no): No.

TOTAL NUMBER OF ATTACHMENTS: None.

RESPONSE:

1. The provision allowing applicants to provide documentation from a state, county, local government, or non-profit organization demonstrating income eligibility was included in the

Companies' 2021 ESAP Implementation Plan (Docket No. 20-12003) and has been carried forward in subsequent ESAP plans.

2. The requirement was added to provide applicants with multiple methods of demonstrating that they satisfy the statutory definition of a Low-Income eligible customer. Under AB465, a Low-Income eligible customer is a residential customer whose household income does not exceed 80 percent of Area Median Income ("AMI"). The alternative documentation pathway provides flexibility for otherwise eligible applicants, including customers who may have recently relocated and are not yet participating in one of the listed assistance programs, to demonstrate compliance with the statutory income requirement.

3. Applicants may demonstrate eligibility through either method described in the Plan. Applicants may provide documentation evidencing participation in one of the listed assistance programs or documentation from a state, county, local government, or nonprofit organization demonstrating that household income does not exceed 80 percent of Area Median Income. Applicants are not required to provide both forms of documentation. Both pathways are intended to demonstrate compliance with the Low-Income eligibility requirement.

AFFIRMATION

Pursuant to the requirements of NRS 53.045 and NAC 703.710, Karen Olesky, states that she is the person identified in the foregoing prepared testimony and/or exhibits; that such testimony and/or exhibits were prepared by or under the direction of said person; that the answers and/or information appearing therein are true to the best of her knowledge and belief; and that if asked the questions appearing therein, her answers thereto would, under oath, be the same.

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

Date: 10/23/26

/s/Karen R. Olesky
Karen Olesky