

**PUBLIC UTILITIES COMMISSION OF NEVADA
MEMORANDUM**

DATE: August 31, 2026

TO: The Commission
Via: Anne-Marie Preisach, DRO

FROM: Ryan Sinclair, P.E., Regulatory Engineer, Engineering Division

SUBJECT: Agenda No 16-26; Item No. ___7A___; Docket No. 25-01027;
Application of DesertLink, LLC, under the provisions of the Utility
Environmental Protection Act, for a permit to construct 12 self-supporting steel
pole structures to interconnect the expanded Sloan Canyon Substation with the
existing Harry Allen-Eldorado 500 kV transmission line and associated facilities
to be located on private and federally-managed land in Clark County, Nevada.

I. Summary of Application

Pursuant to the provisions of the Utility Environmental Protection Act (“UEPA”) and Nevada Revised Statutes (“NRS”) 704.820 through NRS 704.900, on June 16, 2026, DesertLink, LLC (“DesertLink”) filed with the Public Utilities Commission of Nevada (“Commission”) an application for a Permit to Construct (“Application”) 12 self-supporting steel pole structures to interconnect the expanded Sloan Canyon Substation with the existing Harry Allen-Eldorado 500-kilovolt (“kV”) transmission line and associated facilities to be located on private and federally-managed land in Clark County, Nevada (the “Project”).¹

DesertLink requests that the Commission grant the request for a UEPA permit authorizing it to commence construction of the Project as outlined above. The Project will consist of 12 self-supporting steel pole structures to interconnect the expanded Sloan Canyon Substation with the existing Harry Allen-Eldorado 500 kV transmission line and associated facilities, including permanent and temporary access roads on public and municipal lands in Clark County, Nevada. A legal description of the proposed location for the Project is provided in Exhibit A attached hereto. As required by NRS 704.870(1) and Nevada Administrative Code 703.423, the Application contains a Bureau of Land Management (“BLM”) Determination of NEPA Adequacy (“DNA”) for the Project dated May 22, 2026, that relied on a programmatic environmental assessment for the Eldorado Valley Transmission and Utility Corridor (“EA”), issued by BLM on November 23, 2012.

The Regulatory Operations Staff of the Commission (“Staff”) has completed its investigation and recommends that the Commission grant the Application and issue an order authorizing the construction of the Project as outlined herein.

¹ The Project itself does meet the “Utility facility” definition pursuant to NRS 704.860.2(A) because the Project consists of a transmission line that “are designed to operate at 200 kilovolts or more.”

II. Analysis and Investigation

Facilities, Water Use and Employment

The Project will be located on Boulder City land, including a portion within a Designated Utility Corridor administered by the BLM in Clark County, Nevada. In total, the Project's construction is expected to disturb up to approximately 37.1 acres, including the approximately 0.5 miles of temporary access roads, which will reduce to approximately 5.7 acres during operation and maintenance ("O&M"). The Project serves to connect the expanded Sloan Canyon Substation with the existing Harry Allen-Eldorado 500 kV transmission line, via 12 self-supporting steel pole structures to facilitate 2 transmission line segments. Project construction is expected to occur over a 12-16-month period, occurring in phases due to utility outage sequence requirements

DesertLink states water consumption during construction is 2.9 million gallons, which equates to about 8.9 acre-feet annually. The Project will obtain all construction and O&M water from existing permitted commercial, municipal, or private sources.

DesertLink expects the Project will generate approximately 15 to 25 jobs on average and 40 jobs at peak construction.

The Application contains supporting documentation for the Project, including:

Exhibit A	Determination of NEPA Adequacy ("DNA")
Exhibit B	Environmental Assessment
Exhibit C	Regional Map
Exhibit D	Legal Description
Exhibit E	Site Plan Drawings, Vicinity Maps, & Routing Maps
Exhibit F	Layout Diagrams
Exhibit G	Scaled Diagrams of Utility Structures
Exhibit H	SETT Approval
Exhibit I	Public Notice
Exhibit J	Affidavit of Publication — Clark County
Exhibit K	Proof of Submission
Exhibit L	List of Permits and Approvals Obtained
Exhibit M	List of Outstanding Permits and Approvals
Exhibit N	Draft Notice

Staff's investigation and analysis of the Application reflects the UEPA statutes and, in particular, the pertinent provisions of NRS 704.890(1) and (2),² which require the Commission to make

² NRS 704.890 (1) and (2) provide:

"(1) . . . [T]he Commission may not grant a permit for the construction, operation and maintenance of a utility facility, either as proposed or as modified by the Commission, to a person unless it finds and determines:

(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

certain findings and determinations regarding the environmental effect, need, other required permits, and whether the Project is in the public interest. Each of those statutorily required findings are addressed below.

NRS 704.890(1)(a) (Environmental Effects): The Application contains a DNA prepared by the BLM dated May 22, 2026, and EA issued by BLM on November 23, 2012. The EA contains a full analysis of the nature of probable environmental effects of the Project, and the DNA concluded that the EA's analysis was applicable to this Project. The EA analyzed potential impacts on a variety of resources during construction, operation, and maintenance of the improvements similar to those contemplated in this Application. DesertLink states the Project will not cause any substantial additional environmental impacts beyond those analyzed in the EA and addressed by the mitigation measures therein. For these reasons, the Project design proposed herein represents the minimum adverse effect on the environment.

NRS 704.890(1)(b) (Greenhouse Gas Emissions/Effect on Reliability of Service): The Commission is not required to find and determine the extent to which the Project is needed to ensure reliable service to customers in Nevada because the Project does not emit greenhouse gases. However, the Project would help provide utility service to customers, enhance the reliability of utility service, and achieve interstate benefits by the proposed construction or modification of the transmission facilities described herein. Specifically, the connection of the Sloan Canyon Substation expansion with the Harry Allen-Eldorado 500 kV line will increase capacity and access such that the delivery of electricity will be more reliable. Enhanced reliability is crucial to providing utility service to customers in Nevada and stabilizing the regional electrical grid.

NRS 704.890(1)(c) (Balancing Need and Environmental Effect): The need for the Project balances any adverse effects on the environment. DesertLink states that the Harry Allen to Eldorado line serves as a major connection between the transmission systems of Nevada and California. The Project will enable both Nevada and California electric utilities increased access to additional renewable energy generation resources in Southern Nevada. Interconnecting the

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, registrations and approvals required by federal, state, and local statutes, regulations and ordinances;
- (f) That the surplus asset retirement plan filed pursuant to NRS 704.870:
 - (1) Complies with federal, state and local laws;
 - (2) Provides for the remediation and reuse of the facility within a reasonable period; and
 - (3) Is able to be reasonably completed under the funding plan contained in the application; and
- (g) That the facility will serve the public interest.

(2) If the Commission determines that the location of all or a part of the proposed facility should be modified, it may condition its permit upon such a modification. If the applicant has not obtained all the other permits, licenses, registrations and approvals required by federal, state and local statutes, regulations and ordinances as of the date on which the Commission decides to issue a permit, the Commission shall condition its permit upon the applicant obtaining those permits and approvals.”

Harry Allen to Eldorado line with the Sloan Canyon Substation will fold in a higher capacity linkage with the GridLiance West transmission assets in Clark and Nye Counties, and the potential solar generation facilities in that region.

NRS 704.890(1)(d) (Minimum Adverse Effect-Mitigation): The DNA and EA determined that potential impacts will be reduced with the use of best management practices and mitigation measures. Examples of the mitigation measures include:

AIR-12: Dust Control Plan: The applicant shall prepare and comply with a dust control plan in cooperation that addresses emissions of fugitive dust during construction and operation of the project. Provisions for monitoring fugitive dust should be part of the dust control plan and follow protocols and requirements established by the Clark County Department of Air Quality. The following measures shall be implemented as part of the plan: Frequent watering or stabilization of excavations, spoils, access roads, storage piles, and other sources of fugitive dust (parking areas, staging areas, other) if construction activity causes persistent visible emissions of fugitive dust beyond the work area. Use of dust suppressant applications or other suppression techniques to control dust emissions from onsite unpaved roads and unpaved parking areas, as well as to mitigate fugitive dust emissions from wind erosion on areas disturbed by construction activities.

- **AIR-13: Wind Erosion Control:** The applicant shall ensure wind erosion control techniques (e.g., windbreaks, water, and vegetation) are used on all access and maintenance routes and materials stockpiles that may be disturbed during project maintenance and operation. Use of chemical dust suppressants should be avoided in and around areas occupied by special status species. Any windbreaks used should remain in place until the soil is stabilized or permanently covered with vegetation.

NRS 704.890(1)(e) (Other Permits): In addition to the Commission's UEPA Permit to Construct, additional local permits, state permits, and approvals are required for the Project. Prior to the issuance of the UEPA Permits to Construct, Staff recommends that DesertLink be ordered to file with the Commission the following, as compliance items, if not already included in the filing:

- a. Bureau of Land Management – Determination of NEPA Adequacy; Decision Record
- b. Bureau of Land Management – ROW Grant Amendment
- c. Bureau of Land Management – Notice to Proceed with Construction
- d. Nevada Division of Environmental Protection – Clean Water Act Construction Stormwater Permit, including Stormwater Pollution Prevention Plan
- e. Clark County Department of Air Quality – Dust Control Permit
- f. Boulder City Planning Department – Excavation Permit
- g. Boulder City Planning Department – Easement

NRS 704.890(1)(f) (Surplus Asset Retirement Plan): A surplus asset retirement plan is not required for the Project since it does not meet the definition of a “surplus” for purposes of surplus assets as defined in NRS 704.7337.

NRS 704.890(1)(g) (Public Interest): DesertLink has demonstrated in its Application that the Project will serve the public interest. Specifically, the Project would provide additional grid reliability, which will benefit the Nevada economy in the long-term by ensuring that electricity is continuously provided.

III. Notice and Subsequent Action

DesertLink published a Notice of Application for a Permit to Construct in the Las Vegas Review-Journal on June 7, 2026.

On June 24, 2026, the Commission issued a Notice of Application for Utility Environmental Protection Act Permit to Construct Utility Facilities, establishing a deadline of July 22, 2026, for notices of intervention, petitions for leave to intervene, and notices of intent to be a party pursuant to NRS 704.885(1), or to make a limited appearance in the proceeding pursuant to NRS 704.885(2). The Notice was published in the Las Vegas Review-Journal on July 7, 2026. No requests for interventions or comments were filed with the Commission.

The Nevada State Clearinghouse did not request comments from state agencies regarding the Application for a Utility Environmental Protection Act Permit to Construct Utility Facility.

Conclusion and Recommendations

DesertLink, LLC Environmental Statement for the Project identifies the nature of the probable effect on the environment and the required mitigation measures. DesertLink, LLC is in the process of obtaining all permits, licenses and approvals required by state and local statutes, regulations, and ordinances.

Staff recommends that the Commission issue an order granting the request of DesertLink, LLC for the issuance of a UEPA Permit for construction of the Project as defined hereinabove, contingent upon DesertLink, LLC obtaining and filing with the Commission as compliance items, if not already included in the filing, the following permits, licenses, and approvals:

- a. Bureau of Land Management – Determination of NEPA Adequacy; Decision Record
- b. Bureau of Land Management – ROW Grant Amendment
- c. Bureau of Land Management – Notice to Proceed with Construction
- d. Nevada Division of Environmental Protection – Clean Water Act Construction Stormwater Permit, including Stormwater Pollution Prevention Plan
- e. Clark County Department of Air Quality – Dust Control Permit
- f. Boulder City Planning Department – Excavation Permit
- g. Boulder City Planning Department – Easement

Once DesertLink, LLC has obtained and filed with the Commission a copy of the outstanding permits needed for the Project, Staff recommends that the UEPA Permit setting forth a description of the Project be issued to DesertLink, LLC.

Staff recommends that the order contain a provision that if DesertLink, LLC does not file with the Commission all the compliances set forth hereinabove within five years of the effective date of the order, the order will be deemed to be vacated without further action by or order of the Commission.

Staff also requests that the Commission include an ordering paragraph in its order which states: “No construction may commence on any utility facilities that are the subject of this Application for a UEPA Permit to Construct until after the Commission has issued the Permit to Construct for the applicable phase of the Project.”

Staff further recommends that the Commission’s order include findings and conclusions that:

- 1) Accept and incorporate the findings and conclusions in DesertLink, LLC Environmental Assessment and Determination of NEPA Adequacy for the Project;
- 2) In its Environmental Assessment and Determination of NEPA Adequacy for the Project, DesertLink, LLC determined the nature of the probable effect of the Project on the environment;
- 3) The need for the Project balances any adverse effect on the environment;
- 4) The Project represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives;
- 5) DesertLink, LLC 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
- 6) The Project will serve the public interest.

Amber L. Rudnick
Associate
Phone 775.327.3166
ALRudnick@hollandhart.com

August 21, 2026

VIA EMAIL

Georgina Daley
Assistant Staff Counsel
Public Utilities Commission of Nevada
9075 W. Diablo Drive, Suite 250
Las Vegas, Nevada 89148
gdaley@puc.nv.gov

Staff Counsel Support
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701-3109
pucn.sc@puc.nv.gov
dlomoljo@puc.nv.gov

**Re: Docket No. 25-01027 - DesertLink, LLC's Response to Staff Data Request
No. 1-1**

Dear Ms. Osborne:

Enclosed and transmitted herewith is DesertLink, LLC's response to Staff Data Request No. 1-1 in the above-referenced docket. Pursuant to the instructions in your Data Request, we are transmitting the response to the data request electronically. Any questions regarding the transmittal of this response should be directed to me at (775) 327-3166 or by email at alrudnick@hollandhart.com.

Sincerely,

/s/ Amber L. Rudnick

Amber L. Rudnick
Associate
For Holland & Hart LLP

ALR:cpm
Enclosures

Public Utilities Commission of Nevada

Application of DesertLink, LLC, under the provisions of the Utility Environmental Protection Act, for a permit to construct 12 self-supporting steel pole structures to interconnect the expanded Sloan Canyon Substation with the existing Harry Allen-Eldorado 500 kV transmission line and associated facilities to be located on private and federally-managed land in Clark County, Nevada.

DESERTLINK, LLC'S RESPONSE TO STAFF'S DATA REQUEST

DOCKET NO. 25-01027 **REQUEST DATE:** August 20, 2026

REQUEST NOS.: Staff 1-1 **RESPONDER:** Luke Papez

REQUESTER: Sinclair

REFERENCE: Legal Description

STAFF 1: Please provide an electronic copy (in Microsoft Word, paragraph form) of the legal description for the entire Project that DesertLink, LLC would like contained in the Permit to Construct a Utility Facility, including metes and bounds if necessary.

CONFIDENTIAL: No.

ATTACHMENTS CONFIDENTIAL: No.

RESPONSE: Please see the attachment to this response.

1. Attachment 1: Docket No. 25-01027 - DesertLink LLC's Legal Description

Request Date: 8/20/2026

Response Due: 9/3/2026

Legal Description

Mount Diablo Meridian, Nevada

T. 24 S., R. 62 E.,

sec. 24, SE1/4NE1/4SW1/4, and S1/2SW1/4;

sec. 25, NW1/4, and E1/2SW1/4;

sec. 26, SE1/4NE1/4;

sec. 36, NW1/4NE1/4NW1/4

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Holland & Hart LLP and on September 1, 2026, I caused to be served a true and correct copy of the foregoing document to the following:

ELECTRONIC MAIL

Georgina Daley
Assistant Staff Counsel
Public Utilities Commission of Nevada
9075 W. Diablo Drive, Suite 250
Las Vegas, Nevada 89148
gdaley@puc.nv.gov

ELECTRONIC MAIL

Staff Counsel Support
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701-3109
pucn.sc@puc.nv.gov
dlomoljo@puc.nv.gov

/s/Cecilia Martin
Cecilia Martin, Legal Secretary
an employee of Holland & Hart LLP