

-
-
-

25-09010

Public Utilities Commission of Nevada
Electronic Filing

Submitted: 10/21/2025 3:31:08 PM

Reference: 2a425cbf-4949-4779-9ccc-762f51ccf37c

Payment Reference: 79-9ccc-762f51ccf37c

Filed For: Western Resource Advocates

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

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
Western Resource Advocates

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

In the Matter of the Application of)
Southwest Gas Corporation for approval) Docket No. 25-09010
of its 2026-2028 Triennial Integrated Resource)
Plan.)

**PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES,
ADVANCED ENERGY UNITED, AND SOUTHWEST ENERGY EFFICIENCY
PROJECT AS “CLEAN ENERGY ADVOCATES”**

COME NOW Western Resource Advocates (“WRA”), Advanced Energy United (“AEU”) and Southwest Energy Efficiency Project (“SWEEP”) collectively as “Clean Energy Advocates” by and through their attorney, George Cavros, and pursuant to Nevada Revised Statutes (“NRS”) 704.9913 and Nevada Administrative Code (“NAC”) 703.580–703.595, petition the Public Utilities Commission of Nevada (“Commission”) to intervene in this docket.

Communications for Petitioners for the purposes of this matter should be directed to:

GEORGE CAVROS
WRA Senior Attorney
275 Hill Street, Suite 210
Reno, NV 89501
(775) 430-4632
George.cavros@westernresources.org

MICHAEL KENNEY
WRA Building Decarbonization Mgr.
141 E Palace Avenue, Suite 220
Sante Fe, NM 87501
(818) 430-0015
michael.kenney@westernresources.org

ALLISON GEORGE
WRA Program & Legal Assistant
340 E Palm Lane, Suite A140
Phoenix, AZ 85004
(602) 799-4832
allison.george@westernresources.org

SHEILA HALLSTROM
AEU Regulatory Principal
1801 Pennsylvania Ave, NW Suite 410
Washington, D.C. 20006
(224) 545-1033
shallstrom@advancedenergyunited.org

SARAH STEINBERG
AEU Managing Director
1801 Pennsylvania Ave, NW Suite 410
Washington, D.C. 20006
(202) 380-1950
ssteinberg@advancedenergyunited.org

RAMON ALATORRE
SWEEP Utility Program Senior Mgr.
2334 Broadway Ste A
Boulder, CO 80304
(303) 669-5402
ralatorre@swenergy.org

1 COURTNEY FIELDMAN
2 SWEEP Utility Program Director
3 2334 Broadway Ste A
4 Boulder, CO 80304
5 (720) 546-1447
6 cfieldman@swenergy.org

7 **I. IDENTITY OF CLEAN ENERGY ADVOCATES**

8 WRA is a Colorado-based non-profit clean energy organization licensed to do business in
9 Nevada. The Nevada office of WRA is located at 275 Hill Street, Suite 210, Reno, NV 89501.
10 WRA fights climate change and its impacts to sustain the environment, economy, and people of
11 the West. WRA’s Clean Energy Program works to advance plans and policies that provide
12 equitable, clean, affordable, and reliable energy, reduce economic risks, and protect the
13 environment through the expanded use of energy efficiency, renewable energy resources, and
14 other clean energy technologies.¹ WRA incorporates equity into its work by advocating for plans
15 and policies that provide equitable, accessible, and affordable outcomes.² WRA has over 200
16 donors and over 900 supporters in Nevada, and actively participated and provided relevant
17 material relevant evidence in Docket No. 23-07024 that developed the gas integrated resource
18 plan (“IRP”) rule that governs this docket and is more fully discussed below. WRA is also
19 currently engaged in the Commission Docket No. 25-07006 that will establish gas utility
20 alternative ratemaking regulations.³

21 SWEEP is a regional public interest non-profit organization whose mission is to advance
22 energy efficiency and clean transportation, and to expand the economic and environmental

23 ¹ See WRA’s Clean Energy Program webpage, at <https://westernresourceadvocates.org/we-advance-clean-energy-and-reduce-climate-pollution/>.

24 ² See WRA’s Diversity, Equity and Inclusion webpage, at <https://westernresourceadvocates.org/diversity-equity-inclusion/>.

³ See WRA comments, Docket No. 25-07006, August 21, 2025.

1 benefits provided by energy efficiency and electric vehicles.⁴ SWEEP was established in 2001,
2 and it works to advance equitable⁵ energy efficiency, demand response, beneficial electrification,
3 and transportation electrification in utility regulatory proceedings and other public policy forums
4 in Colorado, Arizona, Nevada, New Mexico, Utah, and Wyoming. SWEEP also partners with
5 businesses, state and local governments, and other public interest groups to help develop utility
6 programs, rate designs, and community opportunities to help make it easier to incorporate energy
7 efficiency, demand response, beneficial electrification, and transportation electrification into
8 Nevada homes and business. SWEEP has more than thirty formal Business Allies, many of which
9 are based or operate in Nevada,⁶ and actively participated and provided relevant material
10 evidence in Docket No. 23-07024 that developed the gas IRP rule that governs this docket.

11 AEU is a non-profit national business association that represents over 100 companies and
12 organizations that span the advanced energy sector and its value chains.⁷ AEU's member
13 companies provide a diverse array of technologies and services, including energy efficiency,
14 demand response, heat pumps, home and business energy solutions, large-scale and distributed
15 solar, wind, storage, geothermal, electric vehicles, advanced metering infrastructure, fuel cells,
16 hydro power, transmission and distribution technologies, enabling software and more. Together,
17 these technologies and services create and maintain a high performing energy system that is
18 reliable, resilient, and cost-effective. AEU actively participated and provided relevant material
19 evidence in Docket No. 23-07024 that developed the gas IRP rule that governs this docket.

20
21
22

23 ⁴ See SWEEP's Mission webpage, at <https://www.swenergy.org/mission/>.
24 ⁵ See SWEEP's Equity webpage, at <https://www.swenergy.org/equity/>.
⁶ See SWEEP's Allies webpage, at <https://www.swenergy.org/allies>.
⁷ Many of AEU's members are listed on its website, at <https://advancedenergyunited.org/members>.

1 **II. STANDARD FOR INTERVENTION**

2 On September 17, 2025, Southwest Gas (“SW Gas”) filed its IRP application in the above
3 captioned docket.⁸ The controlling statute for intervention in a gas IRP filing falls under NRS
4 704.9913, which provides:

5 The Commission shall determine the parties to the public hearing on the
6 adequacy of the plan. A person or governmental entity may petition the
7 Commission for leave to intervene as a party. The Commission must grant a
8 petition to intervene as a party in the hearing if the person or entity has relevant
9 material evidence to provide concerning the adequacy of the plan. The
10 Commission may limit participation of an intervener in the hearing to avoid
11 duplication and may prohibit continued participation in the hearing by an
12 intervener if the Commission determines that continued participation will
13 unduly broaden the issues, will not provide additional relevant material
14 evidence or is not necessary to further the public interest. (emphasis added).⁹

12 Additionally, regarding the contents of a petition to intervene, NAC 703.585 provides the
13 following:

14 A petition for leave to intervene must be in writing and set forth the following:

- 15 1. The title and docket number of the proceeding in which leave to
16 intervene is sought;
- 17 2. The name and address of the petitioner and, if represented, the name,
18 address and telephone number of his or her attorney or other authorized
19 representative;
- 20 3. A clear and concise statement of the direct and substantial interest of
21 the petitioner in the proceedings or, for proceedings addressing plans
22 filed pursuant to NRS 704. 741 or 704.991, a statement supporting the
23 claim that the petitioner has relevant material evidence, and, if the
24 petitioner is an association, all information that is necessary for the
petitioner to satisfy the requirements set forth in NAC 703.595;

23 ⁸ SW Gas subsequently filed an amended application on September 24, 2025 clarifying its prayer for relief.

24 ⁹ NRS 704.991.2; *See also* NAC 703.580 (“Any person who claims to have a direct and substantial interest in a proceeding, or relevant material evidence concerning the adequacy of a plan filed pursuant to NRS 704. 741 or 704.991, and desires to participate in it as an intervener must file a petition for leave to intervene with the Commission requesting an order permitting the intervention”).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- 4. The manner in which the petitioner will be affected by the proceedings;
- 5. A statement as to whether the petitioner intends to present evidence in the proceeding; and
- 6. If affirmative relief is sought, a description of the desired relief and the basis for that Relief (emphasis added).¹⁰

Below, Clean Energy Advocates provide a statement supporting their claim that they have relevant, material evidence to present, the manner in which Clean Energy Advocates will be affected by the proceeding, a statement that Clean Energy Advocates intend to present evidence, and the affirmative relief sought.

III. CLEAN ENERGY ADVOCATES HAVE RELEVANT MATERIAL EVIDENCE TO PROVIDE CONCERNING THE ADEQUACY OF THE PLAN.

Clean Energy Advocates intend to actively participate in this case and present evidence by analyzing the filing, including exhibits and workpapers; conducting necessary discovery; submitting expert direct testimony; participating in the evidentiary hearing, including potential cross examination of witnesses; and briefing, if permitted. This engagement is consistent with and in continuation of Clean Energy Advocates’ valuable input and participation in Docket No. 23-07024 in which WRA, AEU and SWEEP provided numerous relevant and material written and oral comments on the development of the gas IRP rule – focused on ensuring that proposed regulations lead to IRP approvals that balance risk and cost and are the lowest reasonable cost

¹⁰ NAC 703.585.

1 for Nevadans.¹¹ The comments provided material, relevant and expert analysis of the proposed
2 regulations drawing from experiences in other jurisdictions and providing reports, such as AEU’s
3 *A Regulator’s Blueprint for 21st Century Utility Planning*,¹² and SWEEP’s *Southwest Gas Study*
4 for the Commission’s consideration.¹³ The issues addressed in the comments included, but were
5 not limited to, supply side and demand side resource assessments and comparative evaluations,
6 load and fuel forecast sensitivities and analysis, long-term arrangements, and capital investment
7 plans – all of which will continue to be relevant and material issues in the evaluation of the SW
8 Gas IRP in this docket. Clean Energy Advocates’ participation in this docket is a natural
9 extension of their participation in the docket that established the rules governing this docket.
10 Clean Energy Advocates’ participation in Docket No. 23-07024 uniquely positions them to
11 provide valuable information and analysis to the Commission that will help inform its decision
12 on the adequacy of the plan – information and analysis that is clearly relevant and material, and
13 which will further the public interest.

14 **IV. CLEAN ENERGY ADVOCATES WILL BE DIRECTLY AND SUBSTANTIALLY**
15 **AFFECTED BY THE OUTCOME OF THE PROCEEDING.**

16 The subject matter of these proceedings directly and substantially affects Clean Energy
17 Advocates. The SW Gas IRP application requests approval of investments and costs in excess of
18
19

20 ¹¹ WRA comments, Docket No. 23-07024, March 8, 2024; AEU comments, Docket No. 23-07024, March 8, 2024;
21 SWEEP comments, Docket No. 23-07024, March 8, 2024; WRA reply comments, Docket No. 23-07024, April 4,
22 2024; WRA and SWEEP comments, Docket No. 23-07024, June 27, 2024; AEU comments, Docket No. 23-
23 07024, June 28, 2024; WRA and SWEEP comments, Docket No. 23-07024, July 11, 2024; AEU comments,
24 Docket No. 23-07024, July 12, 2024; WRA, SWEEP, and AEU supplemental comments, August 28, 2024; WRA,
SWEEP and AEU reply comments, Docket No. 23-07024, September 20, 2024; WRA, SWEEP, and AEU
supplemental comments, August 28, 2024; WRA comments, Docket No. 23-07024, October 16, 2024; SWEEP
comments, Docket No. 23-07024, October 16, 2024; AEU comments, Docket No. 23-07024, October 16, 2024;
WRA reply comments, Docket No. 23-07024, October 30, 2024; SWEEP reply comments, Docket No. 23-07024,
October 30, 2024.

¹² AEU comments, Attachment A, Docket No. 23-07024, March 8, 2024.

¹³ SWEEP comments, Attachment I, Docket No. 23-07024, March 8, 2024.

1 \$200 million dollars¹⁴ and involves proposed significant capital expenditures related to alleged
2 system integrity, necessary extension, replacement and safety projects. Clean Energy Advocates’
3 mission includes ensuring energy system plans are reliable, balancing cost and risk in providing
4 energy to Nevadans at the lowest reasonable cost, reducing greenhouse gas emissions, offering
5 well-developed utility-sponsored energy efficiency programs, and considering beneficial
6 electrification opportunities. The utility has the burden to show that its resource plan is designed
7 to “meet the current and future needs for natural gas at the lowest reasonable cost to the gas utility
8 and its customers,”¹⁵ in addition to providing information on significant capital expenditures,
9 other capital projects, greenhouse emission reductions, and energy efficiency programs. As
10 such, the determinations made in this docket directly affect Clean Energy Advocates and are well
11 within the scope of its individual organizational missions.

12 **V. THE INTERVENTION WOULD NOT UNDULY BROADEN THE ISSUES AND**
13 **WOULD AVOID DUPLICATION.**

14 Clean Energy Advocates’ participation in this proceeding on issues directly raised by SW
15 Gas’ filing will not unduly broaden the issues. WRA, AEU, and SWEEP are consolidating their
16 engagement as one entity under the moniker of “Clean Energy Advocates” which means that the
17 groups will be represented by one attorney, will file consolidated direct expert testimony,
18 propound consolidated discovery, participate at the hearing as one entity, and file briefs, if
19 permitted, as one entity.

20 Additionally, this petition meets the requirements of both NRS Section 704.9913 and NAC
21 Section 703.585. Clean Energy Advocates have provided a compelling statement that they will
22 provide relevant and material information to assist the Commission in determining the adequacy
23

24 ¹⁴ SW Gas Application, Volume 2, September 17, 2025.

¹⁵ SB 281, Section 11.4(d); NRS 704.991.

1 of the plan. Clean Energy Advocates have shown that they intend to present relevant material
2 evidence in the proceeding; they have described the manner in which Clean Energy Advocates'
3 individual organizations will be affected by the proceedings, and accordingly describe the relief
4 sought below.

5 **VI. RELIEF SOUGHT**

6 Clean Energy Advocates wish to participate fully in this matter and exercise all the rights
7 of a party of record as set forth in NAC 703.500(1).

8 Pursuant to NAC 703.590, this petition is timely filed within the applicable period set in
9 the public notice published in accordance with NAC 703.160.

10 WHEREFORE, WRA, AEU, and SWEEP respectfully request that they be permitted to
11 intervene collectively as Clean Energy Advocates and become a party of record in this
12 proceeding, and further that they be entitled to be served with copies of all pleadings, testimony,
13 work papers, and exhibits heretofore filed or as may be hereafter filed by any party in interest.

14 DATED October 21, 2025.

15
16 Attorney for Clean Energy Advocates
Respectfully submitted,

17 

18
19 _____
GEORGE CAVROS
WRA Senior Attorney
20 275 Hill Street, Suite 210
Reno, NV 89501
21 (775) 430-4632
George.cavros@westernresources.org

1 CERTIFICATE OF MAILING

2 Docket No. 25-09010

3 I hereby certify that I have on this date served the foregoing document upon all parties of
4 record in this proceeding by electronic mail to the recipient’s current electronic mail address,
5 facsimile, or mailing a true copy thereof, properly addressed with postage prepaid or forwarded
6 as indicated below to:

7 Regulatory Operations PUCN pucn.sc@puc.nv.gov
8 Staff service.list@puc.nv.gov

9
10 Amy Timperley amy.timperley@swgas.com
11 Kristien Tary kristien.tary@swgas.com
12 Richard Crane richard.crane@swgas.com
13 Scott Leedom Southwest Gas Corporation scott.leedom@swgas.com
14 Andrew Hall andrew.hall@swgas.com
15 Stephanie Smith stephanie.smith@swgas.com
16 Tashia King tashia.king@swgas.com
17 regserve@swgas.com

18 Michael Saunders Bureau of Consumer Protection bcpserv@ag.nv.gov
19 Michelle C. Badorine msaunders@ag.nv.gov
20 mbadorine@ag.nv.gov

21 DATED October 21, 2025.

22 Completed By:
23 /s/ Allison George
24 Allison George
Western Resource Advocates
Program and Legal Assistant