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

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FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 11/2/2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

In the Matter of the Petition of
GREEN RECURSIVE UTILITY SERVICE LLC
for Adoption of a Rule Designating a
Measurement Method for Data Center
Water and Energy Reporting

PETITION FOR ADOPTION OF A RULE
Under NRS 233B.100

Petitioner Green Recursive Utility Service LLC ("GRUS" or "Petitioner") petitions the Public Utilities Commission of Nevada to adopt a rule as follows:

I. THE PETITIONER

Petitioner is Green Recursive Utility Service LLC, a Texas limited liability company, of 205 E 3rd St, Weatherford, TX 76086. Petitioner's contact is Nick Cordova, Principal, management@greenrecursiveutilityservice.org, telephone 817-404-6379. Petitioner's identifiers are: ISNI 0000 0005 3033 4084; Ringgold ID 851161; IANA PEN 65876; FERC CID C013240; SAM UEI JGT4J9QKGCQ3.

GRUS is the publisher of GRUS-STD-60084, a measurement standard for data center water and energy consumption, dedicated to the public domain under a CC0 dedication, and a practitioner of facility consumption audits in the standard's audit form (GRUS-AUD).

II. THE RULE PROPOSED

Petitioner requests that the Commission adopt a rule, in a chapter and section to be assigned by the Commission, providing:

1. *Standard designated.* Reports of water withdrawal, water consumption, and energy consumption filed with the Commission by or on behalf of a data center facility with electric demand of 25 megawatts or more — including reports required in integrated resource planning, tariff proceedings, and any large-load reporting the Commission requires — shall be prepared and stated in accordance with GRUS-STD-60084 v2.0-U (Uniform Edition), published by Green Recursive Utility Service LLC, DOI 10.5281/zenodo.23246001, dedicated to the public domain under CC0 1.0, incorporated by reference. The full text of the standard is filed with this petition.

2. *Contents of reports.* A report under this rule shall state the facility's consumption classification under the standard and the metered quantities from which each reported figure is derived, with water accounted by source and by use and energy separated by function (information-technology load, cooling load, and remaining facility load).

3. *Verification.* A report filed under this rule is subject to verification in the audit form of the standard (GRUS-AUD), under which reported quantities are checked against metered records and filed load.

4. *Availability.* The standard is available to the Commission and to the public at no cost at DOI 10.5281/zenodo.23246001. Incorporation by reference creates no license fee or royalty obligation.

III. REASONS FOR THE RULE

Nevada is approving and planning for data center load at a scale few states match, and the figures on which those decisions rest — how much water a facility withdraws and consumes, how much energy it uses and for what — are today stated by each facility in its own way. No rule of this Commission prescribes a measurement method: no metering granularity, no separation of information-technology load from cooling load, no classification of facilities by measured characteristics, and no verification protocol by which a stated figure can be checked against metered records. Decisions made on figures that cannot be compared between facilities, or audited after the fact, rest on attestations rather than measurements.

GRUS-STD-60084 v2.0-U supplies the missing method. It classifies each facility by measured characteristics — water-use categories crossed with consumption classes computed from the facility's filed load and site conditions, not from the facility's own description of itself. It accounts for energy and water granularly and separated by function. And it carries its own verification protocol in audit form (GRUS-AUD).

The method is demonstrated, not theoretical. It has been applied in full form to a real facility: the granular consumption audit of the Circle T facility in Texas (GRUS-AUD-CTDC-R1, September 2026), performed under the standard, submitted to the City of Keller and the Texas Commission on Environmental Quality, and sworn into the record of that proceeding, with third parties standing on it.

GRUS-STD-60084 is also of record in Texas PUC Project No. 58317 (Item 96), Ohio PUCO Case No. 24-0508-EL-ATA, Arizona Corporation Commission Docket No. E-01773A-26-0123, and New Jersey BPU Docket No. EO26080463.

IV. STATUTORY AUTHORITY AND EFFECT

NRS 233B.100(1) provides that any interested person may petition an agency requesting the adoption of a regulation, and that within 30 days after submission of the petition the agency shall deny the petition in writing, stating its reasons, or initiate the rulemaking procedure. This petition is submitted under that provision. The proposed rule amends no existing regulation and conflicts with none; it designates a measurement method for reports the Commission already receives or may require. Because the standard is dedicated to the public domain, adoption imposes no licensing cost on the Commission, on utilities, or on reporting facilities.

V. PRAYER

Petitioner respectfully asks that the Commission (1) accept this petition, which is submitted with the filing fee of $50 prescribed for a petition for rulemaking; (2) within 30 days, initiate the rulemaking procedure to adopt the rule proposed in Part II, or deny the petition in writing with reasons as NRS 233B.100 provides; and (3) grant such other relief as is proper.

Respectfully submitted,

/s/ Nick Cordova

Nick Cordova, Principal

Green Recursive Utility Service LLC

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Date: October 29, 2026