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Filed For: PR RNO Property Owner 1 LLC

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

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
PR RNO Property Owner 1 LLC

FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 4/20/2026

Davison Van Cleve PC
Attorneys at Law
(909) 575-7320 • dah@dvclaw.com

4675 W Teco Ave., Suite 240
Las Vegas, Nevada 89118

April 20, 2026

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

RE: 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 26-04_____

Dear Ms. Osborne:

Please find enclosed the Application of 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.

If you have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

/s/ Dallas A. Harris
Dallas A. Harris
Nevada Bar No. 14718
4675 W. Teco Ave., Suite 240
Las Vegas, NV 89118
(909) 575-7320 (telephone)
dah@dvclaw.com

Of Attorneys for PR RNO Property Owner 1, LLC

Enclosure

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

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. 26-04___**

APPLICATION OF PR RNO PROPERTY OWNER 1, LLC FOR A PERMIT TO CONSTRUCT THE PERU RIDGE SELF-GENERATION PROJECT UNDER THE UTILITY ENVIRONMENTAL PROTECTION ACT

I. INTRODUCTION

Pursuant to Nevada Revised Statutes ("NRS") § 704.870(1) and Nevada Administrative Code ("NAC") 703.423, PR RNO Property Owner 1, LLC ("PR RNO" or "Applicant"), hereby files with the Public Utilities Commission of Nevada (the "Commission" or "PUCN") this Application for a Permit to Construct ("PTC") the facilities described below, in Storey County, Nevada (the "Utility Facilities"), pursuant to the Utility Environmental Protection Act ("UEPA") set forth in NRS §§ 704.820 to 704.900 (the "Application"). In support of the Application, the Applicant hereby submits the following information and evidence.

PR RNO Property Owner 1, LLC is a Nevada limited liability company engaged in the development, ownership, and operation of data center campus infrastructure in the Tahoe Reno Industrial Center ("TRI Center"), located approximately 22 miles east of Reno in Storey County, Nevada. The TRI Center is one of Nevada's premier master-planned industrial parks and has attracted significant data center, technology, and industrial investment.

The Applicant is seeking a PTC for the Peru Ridge Self-Generation Project (the "Project"), which consists of natural gas-fueled electrical generating facilities to support the power demands of a new data center campus located at the TRI Center. The Project involves the installation of temporary generator equipment, associated natural gas compression infrastructure, fuel delivery

infrastructure, and all necessary appurtenances to produce electricity exclusively for on-site consumption at the Peru Ridge data center facilities.

The Project is being supplied by the generator equipment provider as the equipment provider. The generating equipment is arranged in a defined generator pad area within the Project boundary. The Project also incorporates natural gas fuel supply from the fuel supply provider, which will supply compressed natural gas via trucking to the site for use as generator fuel. The site will include primary compression facilities and, as needed, secondary compression facilities to manage fuel supply.

The Project is located on privately owned, master-planned industrial land within the TRI Center and is consistent with the established industrial development pattern of the area. The area has been substantially graded as part of the broader data center campus development. The Project area is zoned I-2 Heavy Industrial Zone under Storey County Zoning Ordinance Chapter 17.35 and is subject to the Storey County Master Plan land use designation of "Industrial" and the TRI Center Master Plan, which allows for the development of electric generating facilities by entitlement. Construction of the Project is expected to commence in Q1 2027 following issuance of the PTC and all required permits, with a construction period estimated at 6 to 8 months.

The Applicant respectfully requests that the Commission review this Application and issue a Permit to Construct for the Peru Ridge Self-Generation Project.

II. INFORMATION REGARDING THE APPLICANT

PR RNO Property Owner 1, LLC is a limited liability company organized and existing under the laws of the State of Nevada. The Applicant's primary business purpose is the development, ownership, and operation of data center campus infrastructure, including all associated utility and support facilities required for data center operations at the TRI Center in

Storey County, Nevada. The Applicant's principal place of business is located at 3300 East 1st Avenue, Denver, CO 80206.

All correspondence related to this Application should be sent to the undersigned counsel and to the Applicant's designated contact, whose names and addresses are set forth below:

Counsel for Applicant:

Dallas A. Harris
Nevada Bar No. 14718
Davison Van Cleve, P.C.
4675 W. Teco Avenue, Suite 240
Las Vegas, Nevada 89118
Tel: (909) 575-7320
E-Mail: dah@dvclaw.com

And to:
Robert D. Sweetin
Davison Van Cleve, P.C.
4675 W. Teco Avenue, Suite 240
Las Vegas, Nevada 89118
E-Mail: rds@dvclaw.com

Applicant Contact / General Counsel:

Shalini Sharma
General Counsel
Fleet Data Centers
3200 Cherry Creek South Drive, Suite 500
Denver, Colorado 80209
Tel: (917) 620-8322
E-Mail: shalini.sharma@fleetdatacenters.com

III. RESPONSES TO REQUIRED DISCLOSURES

The information required by NAC 703.423 is provided as follows:

A. A Description of the Location of the Proposed Utility Facility, as Required by NRS § 704.870(1) and NAC § 703.423(1):

The Project is located in Storey County, Nevada, within the Tahoe Reno Industrial Center ("TRI Center"), approximately 22 miles east of the City of Reno. The TRI Center is a privately

owned, master-planned industrial park that encompasses thousands of acres of industrial land in the Truckee River Industrial Corridor. The Project site is situated on privately owned land, Storey County Assessor's Parcel Number 005-011-94. The Project area fronts Peru Drive, a public-dedicated roadway within the TRI Center. The site has been graded and leveled under existing grading permits issued by Storey County as part of the broader data center campus development. The Project is located within the I-2 Heavy Industrial zone designation applicable to the TRI Center. No sensitive land uses, residences, or environmentally protected areas are located in the immediate Project vicinity. Access to the Project site is provided via existing TRI Center roadways.

1. Regional Map

A regional map depicting the location of the Project within Storey County and the TRI Center is included as Exhibit A. A facilities layout map showing the Project boundary and equipment arrangement is included as Exhibit B.

2. Legal Description

A survey plat and legal description of the Project parcel(s) is included as Exhibit C.

3. Site Plan Drawings

Preliminary equipment layout drawings for the generator pad and associated facilities are included as Exhibits D and E.

B. A Description of the Proposed Utility Facility, as Required by NAC § 703.423(2):

1. Size and Nature of the Facility

The Project consists of natural gas-fueled electrical generating equipment installed and operated on a defined generator pad area within the TRI Center. The Project is a temporary generating facility intended to supply electrical power exclusively for on-site consumption at the

Peru Ridge data center campus. The primary generator facility is provided by the generator equipment provider.

Based on the preliminary equipment layout (Exhibit D), the generator arrangement occupies an area of approximately 16.7 acres within the defined generator pad footprint. The generating equipment includes 136 Jenbacher J420 natural gas-fueled generators (approximately 1.6 MW each, 218 MW total), six (6) Volvo Penta Model TWD1683GE Tier 4 diesel black start engine gensets, six 1,240-gallon diesel tanks, 72 medium voltage transformers, 136 selective catalytic reduction (SCR) systems, and 176 mobile CNG tanks for temporary storage, together with associated switchgear, protection equipment, control and relay enclosures, utility trenches, and all necessary appurtenances and devices.

The Project also includes natural gas fuel supply infrastructure, consisting of primary and secondary compression facilities for compressed natural gas ("CNG") delivered by truck. CNG is supplied by the fuel supply provider via dedicated trucking routes to the Project site. The CNG would be transported to the site using mobile CNG containers and stored onsite until use. The fuel supply infrastructure includes compression and conditioning equipment necessary to supply natural gas to the generating units at the required pressure and flow rate.

The total Project site encompasses approximately 23.4 acres, inclusive of the generator pad (16.7 acres), access road (2.1 acres), and laydown and staging areas (4.6 acres).

2. Natural Resources Used

Construction activities will require water for dust suppression, concrete mixing (if any), and worker sanitation. Water for construction and operational activities at the Project will be provided by the TRI Center water main located along the public roadway fronting the project site, managed and operated by the Tahoe Reno Industrial General Improvement District ("TRI-GID"). Operational water use will be minimal. Construction materials will include aggregate rock base,

standard electrical equipment, concrete (if any), and steel as required. The temporary power facility will consume natural gas (delivered as CNG) as the primary fuel during operations.

3. Layout Diagrams

See Exhibit B.

4. Standard Site Plan and Drawings

See Exhibits D and E.

5. Renewable Energy Statement

The Project is not an electric generating plant that uses renewable energy as its primary source of energy.

C. A Summary of the Environmental Impact Studies Conducted in Connection with the Proposed Facility, as Required by NAC § 703.423(3) and NRS § 704.870(1):

A summary of environmental impacts is provided below for convenience and to capture the general findings of the UEPA Environmental Statement prepared for the Project by Panorama Environmental, Inc. (the "Environmental Statement"), which is attached as Exhibit F. The Environmental Statement was developed in accordance with the requirements of NRS §§ 704.820-704.900 and provides a thorough analysis of existing conditions, potential impacts, and mitigation measures for each environmental resource category.

1. Geology and Soils

The Project site is located within the TRI Center industrial park in Storey County, Nevada, in an area characterized by semi-arid terrain. The project area has been previously graded and leveled under existing Storey County grading permits issued for the data center campus development. Construction activities will be managed through implementation of Best Management Practices ("BMPs") consistent with the Project's Stormwater Pollution Prevention Plan ("SWPPP") and applicable NDEP Surface Area Disturbance ("SAD") permit requirements.

No paleontologically sensitive formations are known to underlie the Project site; however, the Environmental Statement includes protocols for unanticipated discovery of paleontological resources. All construction will comply with applicable seismic codes.

2. Water Resources

A preliminary evaluation of Waters of the United States ("WOTUS") and wetland resources in the Project area has been conducted. The Project site is classified by FEMA as an "area of minimal flood hazard" and is not located within the 100-year flood zone. Groundwater depth at the Project site is well below the depth of any anticipated excavation or construction activity. A Nevada Construction Stormwater Permit (NPDES) will be obtained from NDEP prior to construction, and a SWPPP will be prepared and implemented to manage construction stormwater.

3. Air Quality and Climate

An air dispersion modeling analysis was prepared in connection with the Project's Class I Operating Permit to Construct ("OPTC") application submitted to the Nevada Division of Environmental Protection ("NDEP") Bureau of Air Pollution Control ("BAPC"). The modeling analysis evaluated compliance with Nevada Ambient Air Quality Standards ("NvAAQS") for criteria pollutants. Modeling results demonstrate that the Facility will not cause or contribute to an exceedance of the NAAQS or NvAAQS for any criteria pollutant. The Project site is in attainment for all criteria pollutants. Construction emissions will be temporary and managed through standard dust suppression BMPs required under the SAD permit. A Class I OPTC Air Permit will be obtained from NDEP/BAPC prior to operations.

4. Biological Resources

The Project site and immediate surroundings are characterized by Sagebrush and Invasive Annual Grassland habitat types, much of which has already been disturbed by industrial

development and TRI Center infrastructure improvements. Pre-construction biological surveys will be conducted consistent with applicable regulatory requirements to identify the presence of any special-status plant or wildlife species. Construction activities will be preceded by a Worker Environmental Awareness Program ("WEAP") to sensitize construction personnel to the potential presence of special-status species and applicable avoidance and minimization measures. Nesting bird surveys will be conducted prior to and during construction in compliance with the Migratory Bird Treaty Act. Electrical infrastructure design will incorporate industry-standard avian safety features to minimize raptor electrocution risk. Clearing and grading will be limited to areas necessary for Project activities.

5. Cultural Resources

An archaeological and cultural resources survey has been conducted for the Project area. No significant historic properties are known to be present within the Project Area of Potential Effect ("APE"). Unanticipated discovery protocols will be implemented in the event that cultural resources, human remains, or other artifacts are encountered during construction, consistent with NRS Chapter 383 and applicable state and tribal consultation requirements. The Project sponsor has conducted or will conduct consultation with the Nevada State Historic Preservation Office ("SHPO") and any interested Native American tribes prior to the initiation of ground-disturbing activities.

6. Land Use

The Project site is zoned I-2 Heavy Industrial Zone under Storey County Zoning Ordinance Chapter 17.35 and bears the land use designation of "Industrial" under the adopted (July 1, 1999) Storey County Master Plan and TRI Center Master Plan. The TRI Center Master Plan authorizes development of electric generating facilities and associated infrastructure by entitlement pursuant to Storey County Zoning Ordinance Title 17 (§ 17.12.064). The Project is subject to the

Development Agreement between Storey County and TRIC, the CC&Rs recorded February 19, 1999 as Document No. 84415 in the office of the Storey County Recorder, and the TRI Center Development Handbook. The Project is fully consistent with applicable land use designations and entitlements.

7. Transportation and Circulation

Access to the Project site will be via existing TRI Center roadways and the public roadway fronting the project parcel. Construction activities will generate temporary increases in construction vehicle trips, primarily for delivery of equipment and materials. CNG delivery to the site will occur approximately 20 times per day on a 24-hour basis via dedicated trucking routes during operations. A traffic management plan will be implemented during construction to minimize disruption to local roadways. All construction vehicle routes will comply with applicable weight limit and routing requirements for Storey County roadways.

8. Visual Resources

The Project is located within an established heavy industrial zone in the TRI Center. The surrounding landscape is characterized by existing industrial facilities, data center campuses, and undeveloped mountainous terrain. The Project does not lie within any designated scenic corridor, viewshed, or visually sensitive area. The temporary nature of the power generation equipment, and its location within the data center campus fence line, will limit its visual prominence. Lighting for the power generation site will be directed downward and shielded to minimize off-site light spillage. Overall visual impacts are expected to be minor given the established industrial setting.

9. Noise

A noise impact assessment was conducted for the Project using dBmap software, applying ISO 9613-2 methodology and modeling point sources representing the generator equipment and supporting facilities. Construction noise will be temporary and limited to daytime hours consistent

with applicable Storey County noise ordinance requirements. Manufacturer-provided sound data indicate that individual gas-fired generators produce sound pressure levels of approximately 85 to 90 dBA at a distance of 1 meter from the unit. Noise modeling results indicate that predicted operational noise levels attenuate to below 55 dB(A) at 660 feet with all 136 J420 engines running. The nearest sensitive receptor is the McCarran Ranch Preserve, located approximately 3 miles west of the Project site. The nearest residential receptor is located approximately 3 miles west. Given the industrial setting and distances, operational noise impacts at sensitive receptors are within acceptable limits. See Exhibit E for the Noise Impact Assessment.

10. Waste Management and Hazardous Materials

The primary waste stream during operations will consist of non-hazardous solid waste including rags, broken metal, machine parts, defective or broken electrical materials, empty containers, and typical site refuse, all of which will be disposed of in an appropriately licensed landfill or recycled where practicable. Limited quantities of hazardous materials will be used onsite for operations and maintenance activities, including oils, lubricants, solvents, coolants, hydraulic fluids, and welding materials. These materials will be managed in small quantities consistent with applicable regulations. Spill prevention, control, and countermeasure ("SPCC") plans will be prepared and implemented. No hazardous waste is anticipated to be generated in reportable quantities.

11. Socioeconomics

Construction of the Project is expected to generate temporary employment with peak personnel of approximately 20 workers and average manpower of approximately 15 per month over a 24-month construction period. Local businesses and suppliers within the region will benefit from construction spending. Long-term operations and maintenance of the temporary power facility will require approximately five permanent positions and a team of qualified technicians

operated and managed by the generator equipment provider. Development of the Peru Ridge data center campus, which the Project serves, represents a significant long-term economic investment in Storey County, including substantial property tax revenues, permanent employment, and economic diversification consistent with the county's industrial growth objectives.

D. A Description of the Probable Residual Effect on the Surrounding Area if the Alternate Locations Were Used, as Required by NAC § 703.423(4):

Applicant evaluated potential alternatives for the placement of the temporary power generation facility within and near the Peru Ridge data center campus. Because the Project is a temporary power system located within the Peru Ridge campus boundary to provide power exclusively and directly to the on-site data center, no alternative locations outside the campus boundary were feasible. The selected location minimizes the length of power transmission cables, eliminates the need for additional off-site infrastructure, and is central to the loads being served. The site has already been graded and leveled under existing Storey County grading permits.

Applicant also considered alternative generator configurations and fuel delivery methods, including alternative generator types and fuel supply arrangements. The selected configuration of generators supplied by the equipment provider with CNG fuel delivery from the fuel supply provider was determined to provide the best balance of generation capacity, operational reliability, environmental performance, and commercial feasibility.

The no-build alternative would eliminate the Project entirely. This alternative fails to meet the Project's purpose and need because it would prevent PR RNO from obtaining the temporary power supply required to serve the data center during the period before NV Energy's permanent utility infrastructure is in service.

Based on these considerations, Applicant submits that the selected Project site and configuration represent a reasonable balance of engineering, reliability, environmental, and land use factors.

E. Proof of Public Notice, as Required by NRS § 704.870(4) and NAC § 703.423(5):

See Exhibit G for the Public Notice and Exhibit H for the Proof of Publication, respectively.

F. Proof of Submittal of the Application to the Nevada State Clearinghouse, as Required by NAC § 703.423(6):

A copy of this Application is being served on the Nevada State Clearinghouse, Division of State Lands. See Exhibit I, Proof of Service.

G. A Description of the Probable Effect of the Proposed Utility Facility on the Environment, as Required by NAC § 703.423(7):

1.(a) Environmental Impacts

Construction impacts will be primarily temporary, localized, and managed through implementation of BMPs and applicable permit conditions. Ground disturbance at the project area, which has been previously graded under existing permits, will be minor. Construction will generate temporary increases in air emissions from equipment exhaust and fugitive dust, which will be managed through NDEP SAD permit requirements including water application and dust palliatives. Temporary noise increases will occur during daytime construction hours. Stormwater will be managed pursuant to an NPDES Construction Stormwater Permit and SWPPP.

Once construction is complete, the power generation facility will operate continuously during the 2-3 year operational period. Operational impacts will include continuous noise from the generators, CNG delivery truck traffic approximately 20 trips per day on a 24-hour basis, and air emissions managed under the NDEP Class I OPTC air permit. Air dispersion modeling using AERMOD methodology, including PSD increment analysis, demonstrates attainment with all

NAAQS at all receptor locations, with the nearest residence approximately 3 miles from the Facility. A full assessment of environmental impacts is provided in the Environmental Statement attached as Exhibit F.

H. The Need to Ensure Reliable Service, as Required by NAC § 703.423(8):

The Project is necessary to provide reliable electrical power to the Peru Ridge data center campus during the period before NV Energy can deliver permanent utility service to the site. Data center growth in the TRI Center is outpacing the pace at which NV Energy can build permanent infrastructure to serve new large industrial loads. Without the temporary power facility, PR RNO would be unable to activate and operate its data center, delaying a significant economic investment in Storey County and the broader Nevada economy.

The Project has been designed in accordance with applicable industry standards to ensure system reliability and power quality. The temporary power system will be operated and maintained by the generator equipment provider, using qualified technicians and established maintenance protocols to ensure continuous and reliable operation during the 2-3 year interim period. The Project serves the public interest by enabling a major industrial employer and taxpayer to commence operations while permanent utility infrastructure is being developed.

I. The Relationship Between the Need to Ensure Reliable Service and the Effect on the Environment, as Required by NAC § 703.423(9):

The Project is a time-limited, project-critical infrastructure necessary to supply power to the Peru Ridge data center during the period before NV Energy can deliver permanent utility service. Environmental impacts associated with the Project are primarily temporary in nature, limited to the construction period, and manageable through implementation of the engineering controls, BMPs, and permit conditions described in the Environmental Statement. Operational impacts, including air emissions and noise, are within established regulatory thresholds as

demonstrated by the air dispersion modeling analysis showing PSD compliance and noise impact assessment conducted for the Project. CNG delivery truck traffic is approximately 20 trips per day on a 24-hour basis.

The Facility is sited within an established I-2 Heavy Industrial zone in the TRI Center, far from sensitive residential and institutional receptors. The benefits of the Project are substantial: enabling operation of a large-scale data center generating significant local employment during construction and operations, producing meaningful property tax revenues for Storey County, and supporting economic diversification in the TRI Center consistent with the county's long-term industrial development objectives. These public benefits clearly justify any adverse environmental effects, which have been mitigated to the extent practicable and are consistent with applicable regulatory standards.

J. An Explanation of Why the Location and Design of the Proposed Utility Facility Will Produce a Minimum Adverse Effect on the Environment, as Required by NAC § 703.423(10):

The selected Project site produces minimum adverse effects on the environment for the following reasons:

First, the temporary power generation facility is located entirely within the Peru Ridge data center campus, which is situated within the TRI Center, a Master Planned I-2 Heavy Industrial zone. The surrounding area consists primarily of existing industrial facilities and undeveloped mountainous terrain. Sensitive land uses, including residences and schools, are located at substantial distances from the Facility.

Second, the project area has been previously graded and leveled under existing Storey County permits, significantly reducing the incremental ground disturbance associated with the

Project. The temporary power generation equipment is largely mobile and requires minimal site preparation.

Third, the Project will implement a comprehensive suite of environmental controls during construction and operations, including BMPs for stormwater management, dust suppression, hazardous materials handling, and waste management, together with all conditions required by applicable NDEP and Storey County permits.

Fourth, the temporary nature of the power generation facility, which is expected to be removed after approximately 2-3 years when permanent NV Energy service is available, further minimizes long-term environmental effects.

K. A List of the Approvals of Any Other Governmental Agency Required Before Construction of the Proposed Utility Facility May Begin, as Required by NAC § 703.423(11):

The following table identifies the permits and approvals required for the Project, the issuing agency, and the expected completion date:

Permit	Issuing Authority	Expected Date
Surface Area Disturbance (SAD) Permit	Nevada Department of Environmental Protection (NDEP), Bureau of Air Pollution Control (BAPC)	Q2 2026 (For Peru Ridge Data Center) Q1 2026 (For Peru Ridge grading at power site)
Nevada Construction Stormwater Permit (NPDES)	NDEP	Q2 2026 (For Peru Ridge Data Center) Q1 2026 (For Peru Ridge grading at power site)
Class 1 OPTC Air Permit	NDEP	Q4 2026
Storey County Building Permit	Storey County	Q2 2026

Applicant commits that all applicable permits and approvals will be submitted to the Commission in response to its UEPA letter of compliance, consistent with NAC 703.423 and NRS 704.870 requirements.

L. A Statement of the Extent to Which the Proposed Utility Facility Will Serve the Public Interest, as Required by NAC § 703.423(12):

(a) Economic Benefits

The Project serves the public interest by enabling PR RNO to commence data center operations, representing a substantial capital investment in Storey County, Nevada. Construction of the Project will generate temporary employment for qualified electrical, mechanical, and civil workers in the region, with peak personnel of approximately 20 workers and average manpower of approximately 15 per month over a 24-month construction period. Local businesses and suppliers within the region will benefit from construction spending. Long-term operations and maintenance of both the data center and associated utility infrastructure will produce sustained employment opportunities, property tax revenues for Storey County, and economic diversification consistent with the county's industrial growth strategy within the TRI Center.

(b) Probable Effect on Environment

Environmental impacts associated with the Project are primarily temporary in nature, confined to the construction period, and limited in geographic extent to the Project site within the established TRI Center industrial park. Operational air quality impacts have been demonstrated through air dispersion modeling to be within all applicable NvAAQS standards at all receptor locations. Operational noise impacts, while continuous during the 2-3 year operational period, are managed through the industrial setting and distance to sensitive receptors. No cumulative adverse environmental effects are anticipated that cannot be mitigated through the application of standard BMPs and permit conditions.

(c) Probable Effect on Public Health, Safety, and Welfare

The Project will be designed, constructed, and operated in full compliance with all applicable federal, state, and local health, safety, and environmental requirements. No unmitigated

adverse impacts to public health, safety, or welfare are anticipated. Construction hazards will be managed through comprehensive health and safety plans adopted by PR RNO Property Owner 1, LLC and applicable contractors. The power generation facility will be secured with appropriate perimeter fencing and staffed by qualified operations personnel from the generator equipment provider. CNG delivery and storage will comply with applicable NFPA, ASME, API, and CGA standards. Nevada and Storey County residents will benefit from the substantial economic development, employment, and tax revenues generated by the Project and the Peru Ridge data center it serves.

IV. CONCLUSION

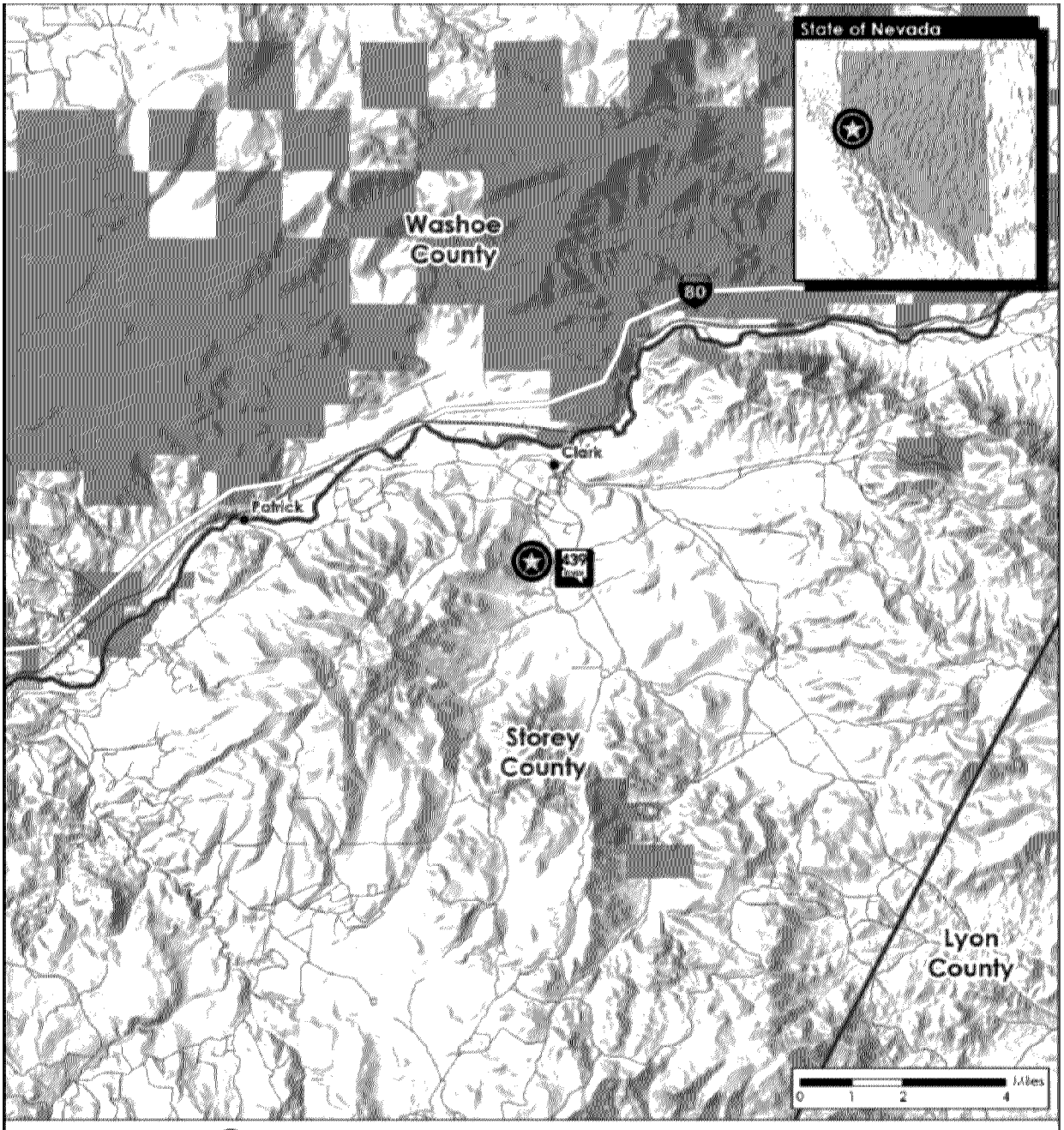
This Application, along with its supporting documents, provides a comprehensive overview of the proposed Project. The included exhibits are as follows: Exhibit A (Project Location Map), Exhibit B (Facilities Layout), Exhibit C (Survey and Legal Description of the Property), Exhibit D (Site Plan and Civil Construction Drawings), Exhibit E (Noise Impact Assessment), Exhibit F (UEPA Environmental Statement), Exhibit G (Public Notice), Exhibit H (Proof of Publication), and Exhibit I (Proof of Service). These documents collectively ensure that all necessary information is available for the Commission's evaluation and approval process.

Dated this 20th day of April, 2026.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.
/s/ Dallas A. Harris
Dallas A. Harris
Nevada Bar No. 14718
Robert D. Sweetin
Nevada Bar No. 6076
Telephone: (909) 575-7320
Email: dah@dvclaw.com
Email: rds@dvclaw.com

Exhibit A



Legend

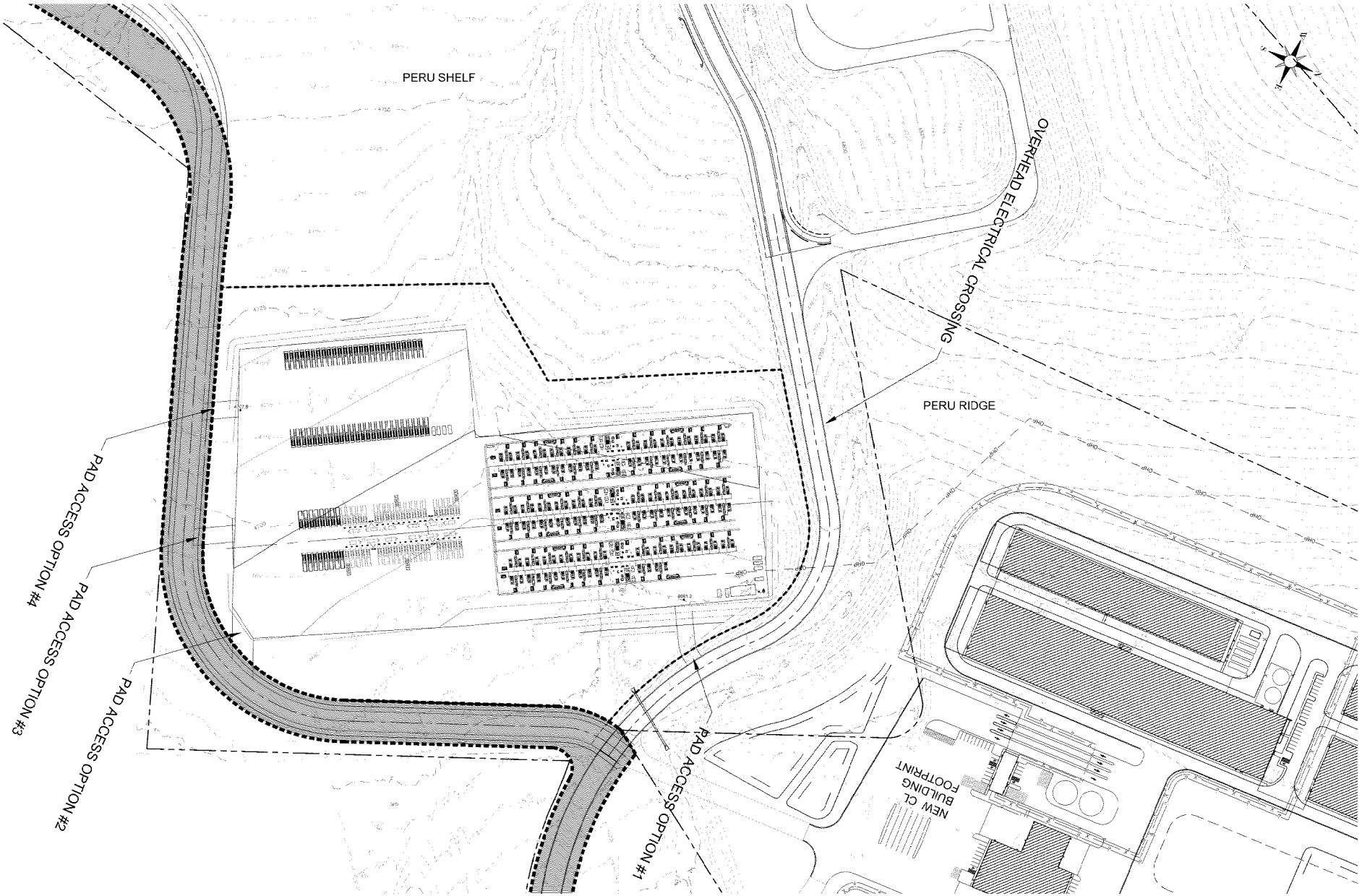
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PANORAMA

- Proposed Project Site
- City
- Highway
- Bureau of Land Management (BLM)
- County Boudnary

Exhibit B



Concept Plan Note:
This concept drawing is for preliminary design purposes only. The data shown hereon is based on approximate horizontal and vertical data and should not be relied upon for accuracy. This is not a boundary survey and should not be relied upon as such.

Exhibit C

OWNER'S CERTIFICATE:

WE, THE UNDERSIGNED OWNER OF ALL AFFECTED PARCELS, HAVE CAUSED THE BOUNDARY LINES OF THESE PARCELS TO BE ADJUSTED PRIOR TO THE DEVELOPMENT OF THIS LAND, INTO THE CONFIGURATION AS SHOWN HEREON, AND DO HEREBY STATE:

1. I HAVE EXAMINED THIS PLAT AND APPROVE AND AUTHORIZE ITS RECORDING.
2. ALL PROPERTY TAXES ON THE LAND FOR THE FISCAL YEAR HAVE BEEN PAID.
3. ANY LENDER WITH AN IMPOUND ACCOUNT FOR THE PAYMENT OF TAXES HAS BEEN NOTIFIED OF THE ADJUSTMENT OF THE BOUNDARY LINE OR THE TRANSFER OF THE LAND.

NVLCO STOREY COUNTY, LLC, A DELAWARE LIMITED LIABILITY COMPANY

BY: _____
JESSICA DENNETT, AUTHORIZED REPRESENTATIVE

NOTARY PUBLIC CERTIFICATE:

STATE OF Colorado
SS
COUNTY OF Denver

THIS DOCUMENT WAS ACKNOWLEDGED BEFORE ME ON THE 24 DAY OF January 2024 A.D. BY JESSICA DENNETT AS AUTHORIZED REPRESENTATIVE OF NVLCO STOREY COUNTY, LLC, A DELAWARE LIMITED LIABILITY COMPANY

Kelsey Johnson
NOTARY PUBLIC

KELSEY CONNOR
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20234031178
MY COMMISSION EXPIRES JULY 7, 2027

WAIVER OF PARCEL MAP REQUIREMENTS:

THIS MAP IS NOT IN CONFLICT WITH CHAPTER 278.010 THROUGH 278.630 OF THE NEVADA REVISED STATUTES AS THE REQUIREMENTS FOR A PARCEL MAP HAVE BEEN WAIVED PER NRS 278.464(3) AND IN ACCORDANCE WITH METROPOLITAN DEVELOPMENT AGREEMENT WITH STOREY COUNTY CONVENTION RECORDED THE 9TH DAY OF FEBRUARY, 2000, PAGE 133, PAGE 635 THROUGH 643, IN THE OFFICIAL RECORDS OF STOREY COUNTY, NEVADA.

TAX CERTIFICATE:

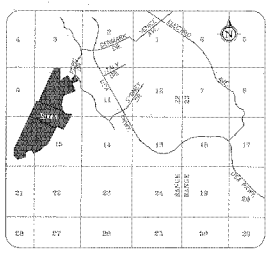
THE UNDERSIGNED HEREBY CERTIFIES THAT ALL PROPERTY TAXES ON THE LAND SHOWN HEREON FOR THE FISCAL YEAR HAVE BEEN PAID AND THAT THE FULL AMOUNT OF ANY DEFERRED PROPERTY TAXES FOR THE CONVERSION OF THE PROPERTY FROM AGRICULTURAL USE HAVE BEEN PAID PURSUANT TO N.R.S. 361.4705.

APN'S: 005-172-19, 005-172-20, & 005-011-36

STOREY COUNTY TREASURER

BY: _____ 1/26/2024
DATE

Jim Hindle Clerk-Treasurer
NAME/TITLE (PRINT)



VICINITY MAP
N.T.S.

LEGAL DESCRIPTION (CONT):

PARCEL 2023-35

ALL THAT CERTAIN REAL PROPERTY SITUATE WITHIN A PORTION OF THE NORTH ONE-HALF (N 1/2) OF SECTION FIFTEEN (15) AND A PORTION OF THE EAST ONE-HALF OF SECTION SIXTEEN (16), TOWNSHIP NINETEEN (19) NORTH, RANGE TWENTY-TWO (22) EAST, M.D.M., COUNTY OF STOREY, STATE OF NEVADA, BEING FURTHER DESCRIBED AS FOLLOWS:

BEGINNING AT THE MOST SOUTHERLY CORNER OF PARCEL 2023-23 OF RECORD OF SURVEY MAP NO. 138189, RECORDED ON AUGUST 23, 2023, FILED IN SAID OFFICIAL RECORDS;

THENCE ALONG THE WESTERLY BOUNDARY OF SAID PARCEL 2023-23 FOR THE FOLLOWING THREE (3) COURSES, ARCS, & DISTANCES:
1. NORTH 39°21'17" WEST A DISTANCE OF 697.05 FEET;
2. NORTH 01°46'08" EAST A DISTANCE OF 634.63 FEET;
3. NORTH 34°26'08" EAST A DISTANCE OF 213.02 FEET;

THENCE DEPARTING SAID WESTERLY BOUNDARY OF SAID PARCEL 2023-23 AND ALONG THE WESTERLY BOUNDARY OF PARCEL 2023-22 OF RECORD OF SURVEY MAP NO. 138189, RECORDED ON AUGUST 23, 2023, FILED IN SAID OFFICIAL RECORDS, NORTH 34°26'08" EAST A DISTANCE OF 1949.76 FEET;

THENCE DEPARTING SAID WESTERLY BOUNDARY OF SAID PARCEL 2023-22, SOUTH 64°08'41" EAST A DISTANCE OF 1333.46 FEET TO THE EASTERLY BOUNDARY OF SAID PARCEL 2023-22;

THENCE ALONG SAID EASTERLY BOUNDARY, SOUTH 27°01'16" WEST A DISTANCE OF 1793.06 FEET;

THENCE DEPARTING SAID EASTERLY BOUNDARY OF SAID PARCEL 2023-22 AND ALONG THE EASTERLY BOUNDARY OF SAID PARCEL 2023-23 FOR THE FOLLOWING EIGHT (8) COURSES, ARCS, & DISTANCES:
1. SOUTH 27°29'42" WEST A DISTANCE OF 404.27 FEET;
2. SOUTH 81°51'00" WEST A DISTANCE OF 1183.19 FEET;
3. SOUTH 01°09'06" WEST A DISTANCE OF 796.05 FEET;
4. NORTH 78°37'55" WEST A DISTANCE OF 1442.94 FEET;
5. SOUTH 88°08'48" WEST A DISTANCE OF 121.00 FEET;
6. SOUTH 00°16'47" WEST A DISTANCE OF 582.90 FEET;
7. SOUTH 71°09'09" WEST A DISTANCE OF 806.02 FEET;
8. SOUTH 09°01'35" EAST A DISTANCE OF 10.56 FEET TO THE POINT OF BEGINNING.

CONTAINING 278.69 ACRES OF LAND, MORE OR LESS.

SURVEYOR'S CERTIFICATE:

I, KAITLIN S. CONSTANTINE, A PROFESSIONAL LAND SURVEYOR LICENSED IN THE STATE OF NEVADA, DO HEREBY CERTIFY THAT:

1. THIS PLAT REPRESENTS THE RESULTS OF A SURVEY PERFORMED UNDER MY DIRECT SUPERVISION AT THE INSTANCE OF NVLCO STOREY COUNTY, LLC, A DELAWARE LIMITED LIABILITY COMPANY.
2. THE LAND SURVEY LIE WITHIN A PORTION OF SECTIONS 10, 15, & 16, TOWNSHIP 19 NORTH, RANGE 22 EAST, M.D.M., COUNTY OF STOREY, STATE OF NEVADA, AND THE SURVEY WAS COMPLETED ON JANUARY 23, 2024.
3. THIS MAP COMPLIES WITH THE APPLICABLE STATUTES OF THIS STATE AND ANY LOCAL ORDINANCES IN EFFECT ON THE DATE THE SURVEY WAS COMPLETED, AND THE SURVEY WAS CONDUCTED IN ACCORDANCE WITH CHAPTER 625 OF THE NEVADA ADMINISTRATIVE CODE.
4. THIS MAP IS NOT IN CONFLICT WITH PROVISIONS OF NRS 278.010 TO 278.630, INCLUSIVE.
5. THE MONUMENTS DEPICTED ON THE PLAT ARE OF THE CHARACTER SHOWN, EXISTING THE POSITIONS INDICATED, AND ARE OF SUFFICIENT NUMBER AND DURABILITY.

KAITLIN S. CONSTANTINE
No. 23013
1/25/24

KAITLIN S. CONSTANTINE, P.L.S.
NEVADA CERTIFICATE NO. 23013

LEGAL DESCRIPTION:

PARCELS 2023-33 THRU 2023-35 WERE CREATED BY GRANT, BARGAIN, & SALE DEED 138804 RECORDED ON January 26th, 2024, FILED IN THE OFFICIAL RECORDS OF STOREY COUNTY, NEVADA, AND MORE PARTICULARLY DESCRIBED AS FOLLOWS:

PARCEL 2023-33

ALL THAT CERTAIN REAL PROPERTY SITUATE WITHIN A PORTION OF SECTION TEN (10), TOWNSHIP NINETEEN (19) NORTH, RANGE TWENTY-TWO (22) EAST, M.D.M., COUNTY OF STOREY, STATE OF NEVADA, BEING FURTHER DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEASTERLY CORNER OF PARCEL 2018-10 OF RECORD OF SURVEY MAP NO. 121133, RECORDED ON JANUARY 25, 2018, FILED IN THE OFFICIAL RECORDS OF STOREY COUNTY, NEVADA;

THENCE ALONG THE NORTHERLY BOUNDARY OF SAID PARCEL 2018-10 FOR THE FOLLOWING FOUR (4) COURSES, ARCS, & DISTANCES:
1. NORTH 51°03'15" EAST A DISTANCE OF 1064.43 FEET TO THE BEGINNING OF A NON-TANGENT CURVE TO THE RIGHT;
2. FROM WHICH A RADIAL LINE BEARS SOUTH 23°02'34" EAST, 132.92 FEET ALONG THE ARC OF A 84.24 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 89°47'41";
3. SOUTH 22°27'45" EAST A DISTANCE OF 84.24 FEET;
4. NORTH 51°04'41" EAST A DISTANCE OF 881.37 FEET TO THE WESTERLY RIGHT-OF-WAY OF PERU DRIVE PER DEED OF DEDICATION DOCUMENT NO. 110951, RECORDED ON JANUARY 05, 2000, IN SAID OFFICIAL RECORDS, ALSO BEING THE BEGINNING OF A NON-TANGENT CURVE TO THE LEFT;

THENCE DEPARTING SAID NORTHERLY BOUNDARY AND ALONG SAID WESTERLY RIGHT-OF-WAY, FROM WHICH A RADIAL LINE BEARS NORTH 69°58'32" EAST, 41.63 FEET ALONG THE ARC OF A 870.00 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 02°44'27" TO THE BEGINNING OF A REVERSE CURVE;

THENCE CONTINUING ALONG SAID WESTERLY RIGHT-OF-WAY, 124.45 FEET ALONG THE ARC OF A 870.00 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 08°11'46";

THENCE DEPARTING SAID WESTERLY RIGHT-OF-WAY, 124.45 FEET ALONG THE SOUTHERLY BOUNDARY OF SAID PARCEL 2018-10, FOR THE FOLLOWING THREE (3) COURSES, ARCS, & DISTANCES:
1. SOUTH 87°20'11" WEST A DISTANCE OF 1418.11 FEET TO THE BEGINNING OF A TANGENT CURVE TO THE RIGHT;
2. 340.14 FEET ALONG THE ARC OF A 800.00 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 23°56'23" TO THE BEGINNING OF A REVERSE CURVE;
3. 97.99 FEET ALONG THE ARC OF A 1000.00 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 05°36'59";

THENCE DEPARTING SAID SOUTHERLY BOUNDARY AND ALONG THE EASTERLY BOUNDARY OF SAID PARCEL 2018-10 FOR THE FOLLOWING EIGHT (8) COURSES, ARCS, & DISTANCES:
1. SOUTH 69°37'49" EAST A DISTANCE OF 1014.35 FEET;
2. SOUTH 68°50'12" WEST A DISTANCE OF 1401.10 FEET;
3. SOUTH 13°59'04" WEST A DISTANCE OF 917.10 FEET TO THE BEGINNING OF A TANGENT CURVE TO THE LEFT;
4. 735.05 FEET ALONG THE ARC OF A 2027.50 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 20°46'15";
5. SOUTH 06°46'05" EAST A DISTANCE OF 460.50 FEET TO THE BEGINNING OF A NON-TANGENT CURVE TO THE RIGHT;
6. FROM WHICH A RADIAL LINE BEARS SOUTH 31°34'40" WEST, 18.85 FEET ALONG THE ARC OF A 80.25 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 13°27'27" TO THE BEGINNING OF A NON-TANGENT CURVE TO THE LEFT;
7. FROM WHICH A RADIAL LINE BEARS SOUTH 43°31'50" EAST, 215.44 FEET ALONG THE ARC OF A 80.00 FOOT RADIUS CURVE, THROUGH A CENTRAL ANGLE OF 215°10'00";
8. SOUTH 23°48'50" EAST A DISTANCE OF 196.70 FEET;

THENCE DEPARTING SAID EASTERLY BOUNDARY, NORTH 66°11'10" WEST A DISTANCE OF 1006.01 FEET TO THE WESTERLY BOUNDARY OF PARCEL 2023-22 OF RECORD OF SURVEY MAP NO. 138188, RECORDED ON AUGUST 23, 2023, FILED IN SAID OFFICIAL RECORDS;

THENCE ALONG SAID WESTERLY BOUNDARY, NORTH 24° 45' 05" EAST A DISTANCE OF 2941.18 FEET TO THE NORTHERLY SECTION LINE OF SAID SECTION 10;

THENCE DEPARTING SAID WESTERLY BOUNDARY AND ALONG SAID NORTHERLY SECTION LINE, SOUTH 89°18'27" EAST A DISTANCE OF 639.00 FEET;

THENCE DEPARTING SAID NORTHERLY SECTION LINE AND ALONG THE EASTERLY BOUNDARY OF SAID PARCEL 2023- 22, SOUTH 03°11'16" WEST A DISTANCE OF 1402.99 FEET TO THE POINT OF BEGINNING.

CONTAINING 273.93 ACRES OF LAND, MORE OR LESS.

PARCEL 2023-34

ALL THAT CERTAIN REAL PROPERTY SITUATE WITHIN A PORTION OF THE SOUTH ONE-HALF (S 1/2) OF SECTION TEN (10) AND A PORTION OF THE NORTH ONE-HALF (N 1/2) OF SECTION FIFTEEN (15), TOWNSHIP NINETEEN (19) NORTH, RANGE TWENTY-TWO (22) EAST, M.D.M., COUNTY OF STOREY, STATE OF NEVADA, BEING FURTHER DESCRIBED AS FOLLOWS:

COMMENCING AT THE MOST SOUTHEASTERLY CORNER OF PARCEL 2023-22 OF RECORD OF SURVEY MAP NO. 138188, RECORDED ON AUGUST 23, 2023, FILED IN SAID OFFICIAL RECORDS;

THENCE ALONG THE SOUTHEASTERLY BOUNDARY OF SAID PARCEL 2023-22, NORTH 27°01'16" EAST A DISTANCE OF 1793.06 FEET TO THE POINT OF BEGINNING;

THENCE DEPARTING SAID SOUTHEASTERLY BOUNDARY, NORTH 64°08'41" WEST A DISTANCE OF 1333.46 FEET TO THE WESTERLY BOUNDARY OF SAID PARCEL 2023-22

THENCE ALONG SAID WESTERLY BOUNDARY FOR THE FOLLOWING FOUR (4) COURSES, ARCS, & DISTANCES:
1. NORTH 24°45'05" EAST A DISTANCE OF 1838.16 FEET;
2. SOUTH 89°11'10" EAST A DISTANCE OF 1968.88 FEET;
3. NORTH 89°55'51" EAST A DISTANCE OF 2102.70 FEET;
4. NORTH 34°55'08" EAST A DISTANCE OF 2160.66 FEET;

THENCE DEPARTING SAID WESTERLY BOUNDARY, SOUTH 64°03'51" EAST A DISTANCE OF 3084.91 FEET TO THE EASTERLY BOUNDARY OF PARCEL 2018-10 OF RECORD OF SURVEY MAP NO. 121133, RECORDED ON JANUARY 25, 2018, FILED IN SAID OFFICIAL RECORDS;

THENCE ALONG SAID EASTERLY BOUNDARY FOR THE FOLLOWING FIVE (5) COURSES, ARCS, & DISTANCES:
1. SOUTH 35°02'02" EAST A DISTANCE OF 140.32 FEET;
2. SOUTH 55°13'26" EAST A DISTANCE OF 254.02 FEET;
3. SOUTH 87°37'11" EAST A DISTANCE OF 704.43 FEET;
4. SOUTH 20°56'53" WEST A DISTANCE OF 1126.61 FEET;
5. SOUTH 03°48'57" WEST A DISTANCE OF 1439.1 FEET;

THENCE DEPARTING SAID EASTERLY BOUNDARY OF SAID PARCEL 2018-10 AND ALONG THE EASTERLY BOUNDARY OF SAID PARCEL 2023-22 FOR THE FOLLOWING FIVE (5) COURSES, ARCS, & DISTANCES:
1. SOUTH 89°55'51" WEST A DISTANCE OF 2049.85 FEET;
2. SOUTH 19°43'54" WEST A DISTANCE OF 2649.84 FEET;
3. SOUTH 38°16'30" WEST A DISTANCE OF 2449.99 FEET;
4. NORTH 21°41'30" WEST A DISTANCE OF 869.34 FEET;
5. NORTH 27°29'42" WEST A DISTANCE OF 333.66 FEET TO THE POINT OF BEGINNING

CONTAINING 182.40 ACRES OF LAND, MORE OR LESS.

FILE NUMBER 138805
FILED FOR RECORD AT THE REQUEST OF
DOWL, LLC
ON THIS 26 DAY OF JANUARY
2024 AT 11 MINUTES PAST 1 O'CLOCK P.M.
OFFICIAL RECORDS OF STOREY COUNTY, NEVADA
COUNTY RECORDER
BY: DRU MCPHERSON
FEE $59.00

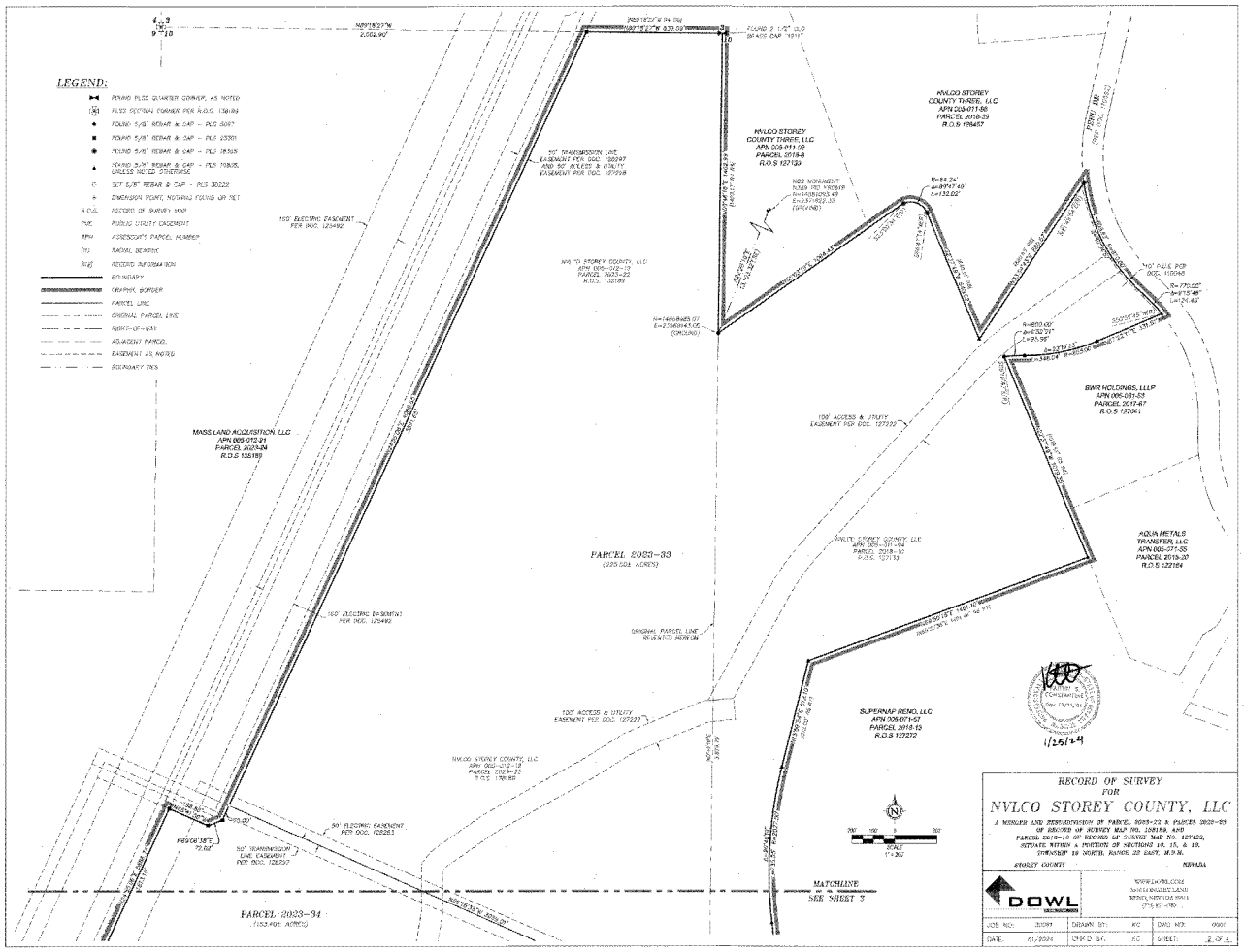
RECORD OF SURVEY FOR NVLCO STOREY COUNTY, LLC

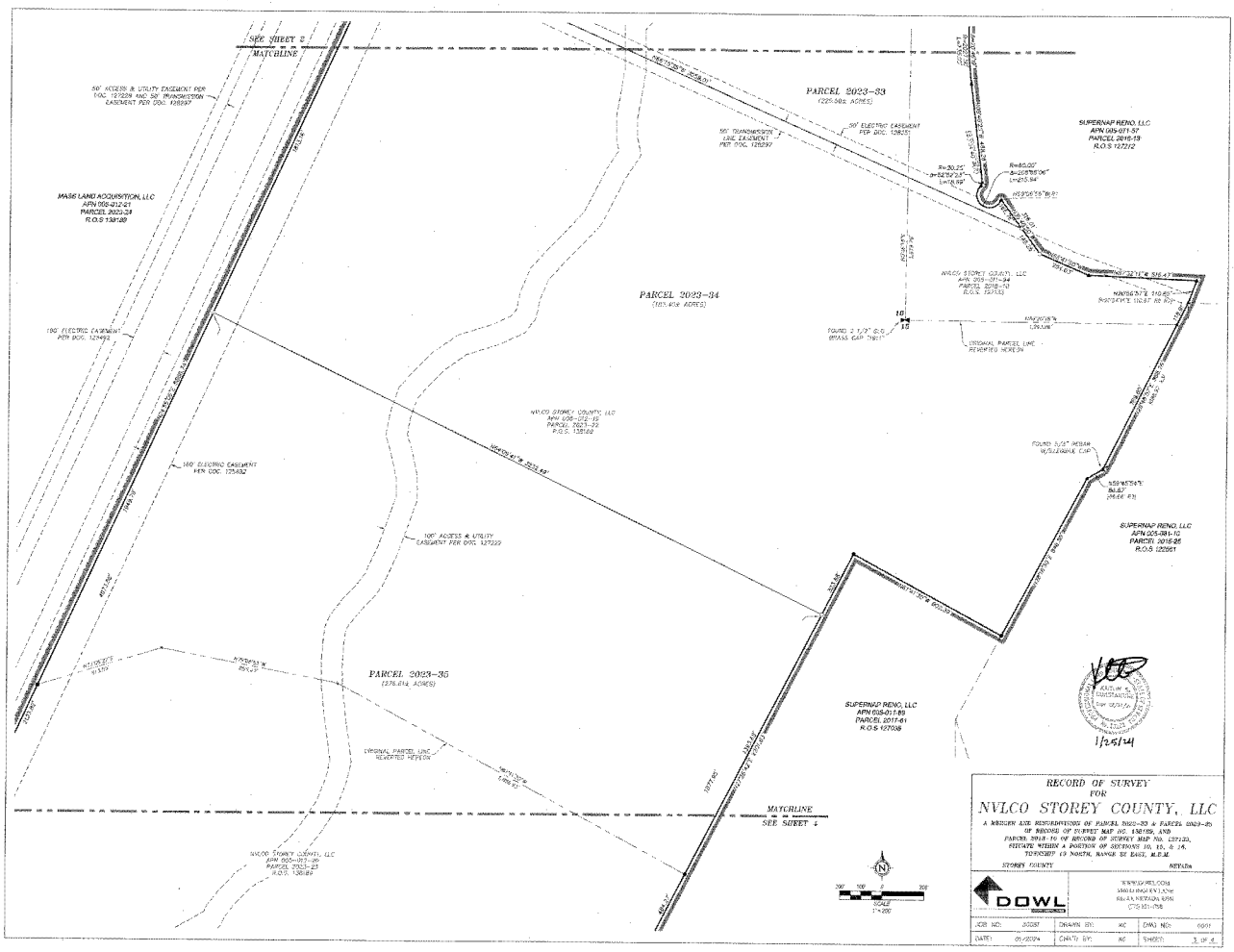
A MERGER AND RESUBDIVISION OF PARCEL 2023-22 & PARCEL 2023-23 OF RECORD OF SURVEY MAP NO. 138189, AND PARCEL 2018-10 OF RECORD OF SURVEY MAP NO. 121133, SITUATE WITHIN A PORTION OF SECTIONS 10, 15, & 16, TOWNSHIP 19 NORTH, RANGE 22 EAST, M.D.M.

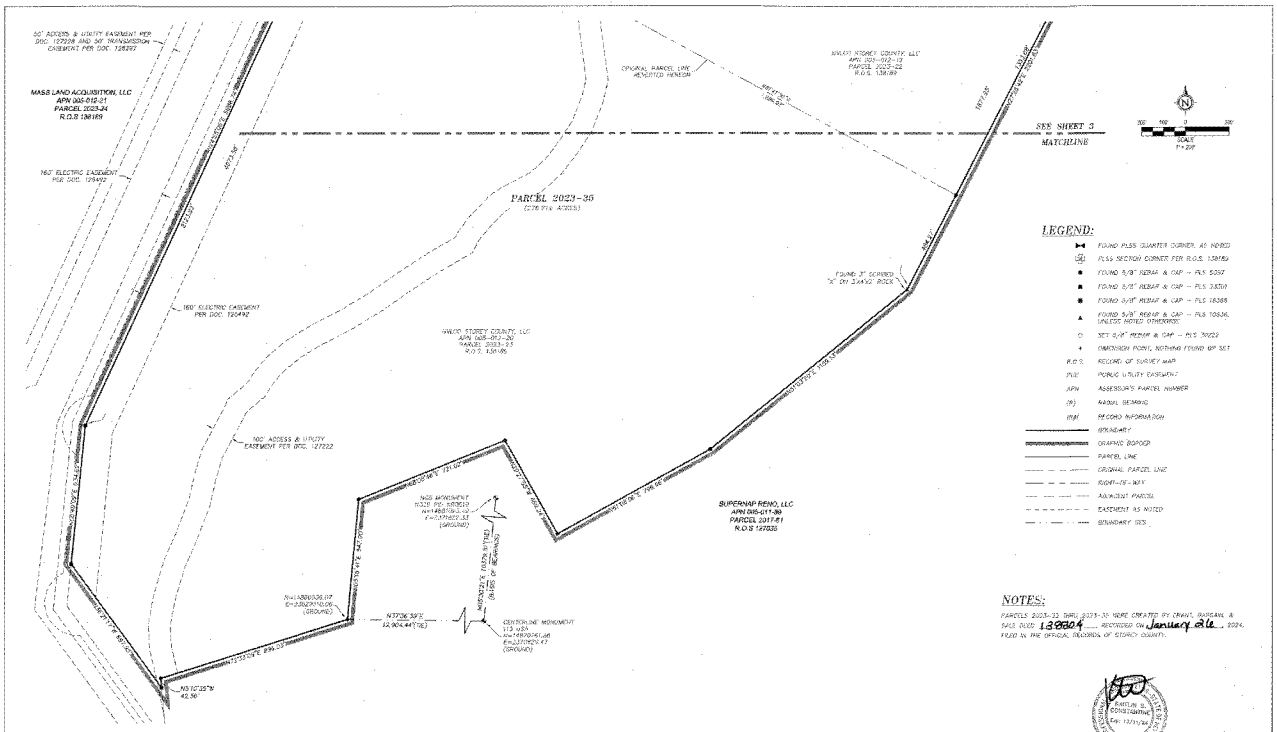
STOREY COUNTY NEVADA

DOWL
5510 LOUIE LANE
RENO, NEVADA 89511
(775) 851-4788

JOB NO:	30041	DRAWN BY:	KD	DWG NO:	0201
DATE:	01/2024	CHKD BY:	KD	SHEET:	1 OF 4


LEGEND:
FOUND PLSS QUARTER CORNER, AS NOTED
PLSS SECTIONAL CORNER PER R.O.S. 138189
FOUND 5/8" REBAR & CAP - PLS 5087
FOUND 5/8" REBAR & CAP - PLS 13301
FOUND 5/8" REBAR & CAP - PLS 18535
FOUND 5/8" REBAR & CAP - PLS 19805, UNLESS NOTED OTHERWISE
SET 5/8" REBAR & CAP - PLS 30222
DIMENSION POINT, NOTHING FOUND OR SET
R.O.S. RECORD OF SURVEY MAP
PUE PUBLIC UTILITY EASEMENT
APN ASSESSOR'S PARCEL NUMBER
(R) RADIAL BEARING
(R&R) RECORD INFORMATION
BOUNDARY
GRAPHIC BORDER
PARCEL LINE
ORIGINAL PARCEL LINE
RIGHT-OF-WAY
ADJACENT PARCEL
EASEMENT AS NOTED
BOUNDARY TIES
N89°18'27"W 2,662.90'
FOUND 3 1/2" DLD BRASS CAP "1974"
50' TRANSMISSION LINE EASEMENT PER DOC. 150247 AND 50' ACCESS & UTILITY EASEMENT PER DOC. 127918
NVLCO STOREY COUNTY THREE, LLC APN 003-011-02 PARCEL 2018-8 R.O.S 137133
NVLCO STOREY COUNTY THREE, LLC APN 003-071-05 PARCEL 2018-35 R.O.S 139457
NGS MONUMENT NGS PID Y30918 N=4358109.49 E=2571922.33 (GROUND)
R=84.24' Δ=89°47'49" L=132.02'
TRINITY RD (PUBLIC ROAD)
100' ELECTRIC EASEMENT PER DOC. 125492
NVLCO STOREY COUNTY, LLC APN 005-012-19 PARCEL 2023-22 R.O.S. 137188
N=1480848.07 E=2568145.05 (GROUND)
CENTERLINE OF 100' ELECTRIC EASEMENT
S89°47'54"E 1,004.33'
S34°47'54"E 1,004.33'
S89°47'54"E 1,339.00'
100' P.U.E. PER DOC. 110048
R=770.00' Δ=9°13'48" L=124.08'
R=800.00' Δ=6°52'01" L=95.98'
R=338.09'
BWR HOLDINGS, LLLP APN 005-051-53 PARCEL 2017-67 R.O.S 137041
MASS LAND ACQUISITION, LLC APN 005-012-21 PARCEL 2023-24 R.O.S 138189
100' ACCESS & UTILITY EASEMENT PER DOC. 127222
PARCEL 2023-33 (220.504 ACRES)
NVLCO STOREY COUNTY, LLC APN 005-311-04 PARCEL 2018-10 R.O.S. 137133
AQUA METALS TRANSFER, LLC APN 005-071-55 PARCEL 2019-20 R.O.S 132164
160' ELECTRIC EASEMENT PER DOC. 125492
ORIGINAL PARCEL LINE RELOCATED HEREON
S89°47'54"E 1,661.16' (M)
S89°47'54"E 1,661.44' (R)
100' ACCESS & UTILITY EASEMENT PER DOC. 127222
NVLCO STOREY COUNTY, LLC APN 005-012-18 PARCEL 2023-23 R.O.S. 138188
SUPERNAP RENO, LLC APN 026-071-52 PARCEL 2018-13 R.O.S 122372
N89°18'27"W 2,662.90'
N89°18'27"W 75.00'
50' ELECTRIC EASEMENT PER DOC. 128251
50' TRANSMISSION LINE EASEMENT PER DOC. 128557
PARCEL 2023-34 (153.401 ACRES)
MATCHLINE SEE SHEET 3
SCALE 1" = 200'
1/25/24
RECORD OF SURVEY FOR
NVLCO STOREY COUNTY, LLC
A MERGER AND RESUBDIVISION OF PARCEL 2023-22 & PARCEL 2023-33 OF RECORD OF SURVEY MAP NO. 138188, AND PARCEL 2018-13 OF RECORD OF SURVEY MAP NO. 127133, SITUATE WITHIN A PORTION OF SECTIONS 10, 15, & 16, TOWNSHIP 19 NORTH, RANGE 25 EAST, M.D.B.M.
STOREY COUNTY NEVADA
DOWL
JOB NO: 33297
DRAWN BY: KC
DWG NO: 0901
DATE: 01/2024
CHK'D BY: KC
SHEET: 2 OF 4


SEE SHEET 2
MATCHLINE
50' ACCESS & UTILITY EASEMENT PER DOC. 121224 AND 50' TRANSMISSION EASEMENT PER DOC. 118937
MABE LAND ACQUISITION, LLC
APN 008-212-21
PARCEL 2023-24
R.O.S 138128
100' ELECTRIC EASEMENT PER DOC. 125492
100' ELECTRIC EASEMENT PER DOC. 125492
100' ACCESS & UTILITY EASEMENT PER DOC. 127223
PARCEL 2023-33
(225.982 ACRES)
50' TRANSMISSION LINE EASEMENT PER DOC. 126297
50' ELECTRIC EASEMENT PER DOC. 126251
SUPERNAP RENO, LLC
APN 005-071-57
PARCEL 2016-13
R.O.S 127212
PARCEL 2023-34
(185.408 ACRES)
NVLCO STOREY COUNTY, LLC
APN 005-071-34
PARCEL 2018-13
R.O.S. 127153
FOUND 2 1/2" G.D. BRASS CAP "1917"
ORIGINAL PARCEL LINE REVERTED HEREON
NVLCO STOREY COUNTY, LLC
APN 008-212-16
PARCEL 2023-22
R.O.S. 138128
FOUND 5/8" REBAR W/ILLEGIBLE CAP
SUPERNAP RENO, LLC
APN 005-381-10
PARCEL 2016-25
R.O.S 132061
PARCEL 2023-35
(276.814 ACRES)
ORIGINAL PARCEL LINE REVERTED HEREON
SUPERNAP RENO, LLC
APN 008-011-89
PARCEL 2017-61
R.O.S 127058
MATCHLINE
SEE SHEET 4
NVLCO STOREY COUNTY, LLC
APN 005-071-36
PARCEL 2023-23
R.O.S. 138140
1" = 200'
RECORD OF SURVEY
FOR
NVLCO STOREY COUNTY, LLC
A RESURVEY AND RECONFIGURATION OF PARCEL 2022-33 & PARCEL 2023-35 OF RECORD OF SURVEY MAP NO. 138128, AND PARCEL 2018-16 OF RECORD OF SURVEY MAP NO. 132123, SITUATE WITHIN A PORTION OF SECTIONS 10, 15, & 16, TOWNSHIP 19 NORTH, RANGE 22 EAST, M.D.M.
STOREY COUNTY NEVADA
DOWL
JOB NO: 350287
DRAWN BY: MC
DWG NO: 0001
DATE: 01/2024
CHK'D BY: RC
SHEET: 3 OF 4
1/25/24



LEGEND:

- FOUND PLSS QUARTER CORNER, AS NOTED
- PLSS SECTION CORNER PER R.O.S. 138189
- FOUND 5/8" REBAR & CAP – PLS 5397
- FOUND 5/8" REBAR & CAP – PLS 23570
- FOUND 5/8" REBAR & CAP – PLS 18368
- FOUND 5/8" REBAR & CAP – PLS 10834, UNLESS NOTED OTHERWISE
- SET 5/8" REBAR & CAP – PLS 30023
- UNKNOWN POINT, NOTHING FOUND OR SET
- R.O.S. RECORD OF SURVEY MAP
- PUE PUBLIC UTILITY EASEMENT
- APN ASSESSOR'S PARCEL NUMBER
- (R) RADIAL BEARING
- (M) RECORD INFORMATION
- BOUNDARY
- DRAWING BOARDS
- PARCEL LINE
- ORIGINAL PARCEL LINE
- RIGHT-OF-WAY
- ADJACENT PARCEL
- EASEMENT AS NOTED
- BOUNDARY LINE

NOTES:

PARCELS 2023-33 THRU 2023-36 WERE CREATED BY DEANS, BARGAIN, & SALE DEED 138604 RECORDED ON January 26, 2024, FILED IN THE OFFICIAL RECORDS OF STOREY COUNTY.

RANDON M. BARGAIN, PLS 30023 EXP: 12/31/24

1/25/24

REFERENCES:

1. RECORD OF SURVEY MAP NO. 123570, JANUARY 22, 2019.
2. RECORD OF SURVEY MAP NO. 122164, MAY 22, 2018.
3. AMENDED RECORD OF SURVEY MAP NO. 121591, JULY 27, 2005.
4. RECORD OF SURVEY MAP NO. 129535, JANUARY 17, 2020.
5. RECORD OF SURVEY MAP NO. 129540, JANUARY 17, 2020.
6. RECORD OF SURVEY MAP NO. 123713, JANUARY 30, 2019.
7. RELEASE OF SURVEY MAP NO. 125370, FEBRUARY 16, 2016.
8. RECORD OF SURVEY MAP NO. 126712, SEPTEMBER 20, 2018.
9. RECORD OF SURVEY MAP NO. 138189, AUGUST 28, 2023.
10. DEANS, BARGAIN, & SALE DEED DOCUMENT NO. 138243, SEPTEMBER 25, 2023.

ALL THE ABOVE ARE OFFICIAL RECORDS OF STOREY COUNTY, NEVADA

BASIS OF BEARINGS:

NEVADA STATE PLANE COORDINATE SYSTEM, WEST ZONE, NORTH AMERICAN DATUM OF 1983/1994, HIGH ACCURACY REFERENCE NETWORK (NAD 83/94-HARN). THE BEARING BETWEEN NATIONAL GEODETIC SURVEY (NGS) STATION NJ39 AND THE CENTERLINE MONUMENT 1/2 IN PAPER AS NORTH 00°36'21" EAST. ALL DIMENSIONS SHOWN ARE GROUND DISTANCES. COMBINED GRID-TO-GROUND FACTOR = 1.000281433.

AREA SUMMARY:

PARCEL 2023-25= 220.50± ACRES
PARCEL 2023-26 = 183.40± ACRES
PARCEL 2023-27 = 276.61± ACRES
TOTAL AREA = 686.50± ACRES

RECORD OF SURVEY
FOR
NVLCO STOREY COUNTY, LLC

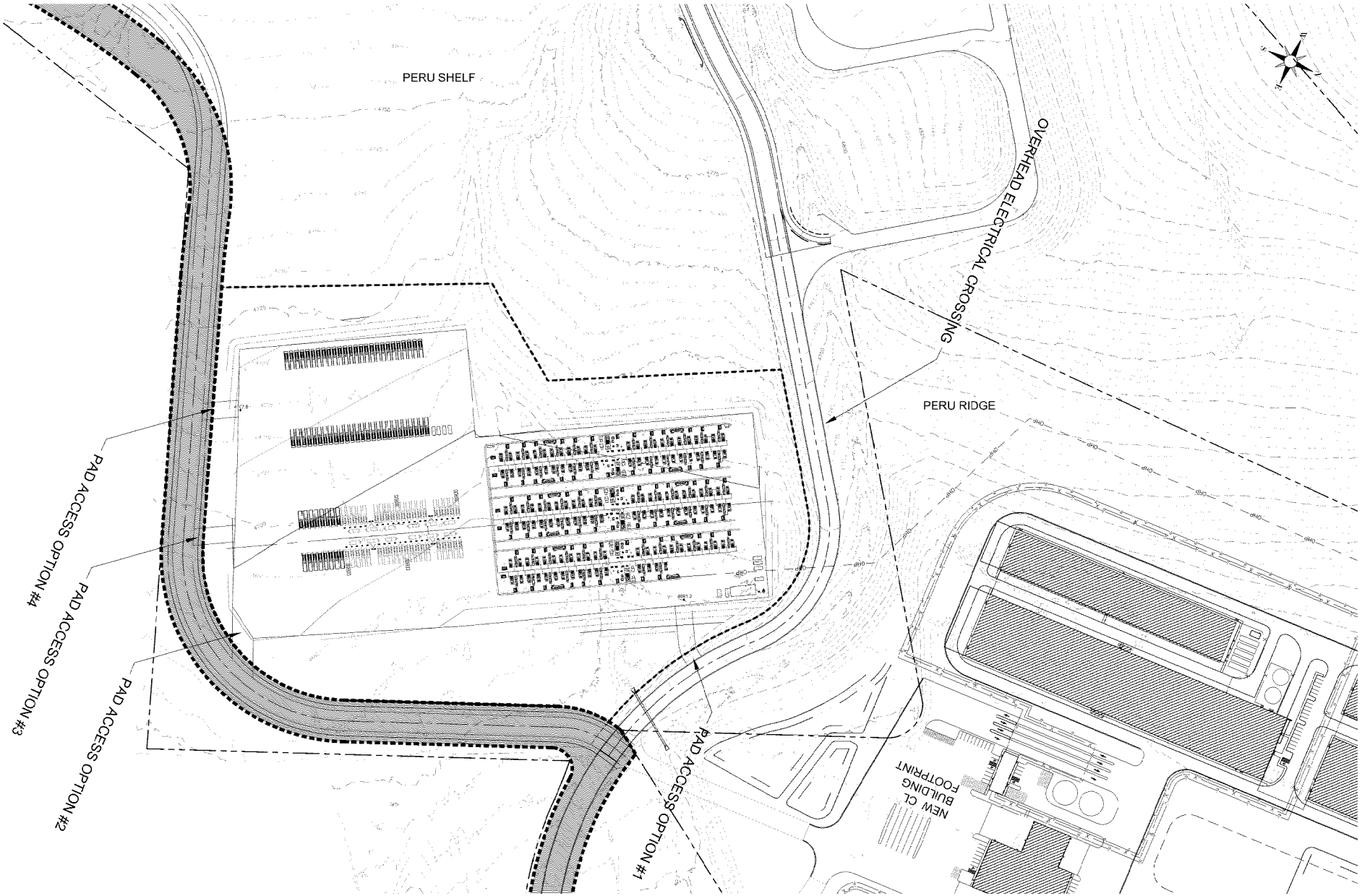
A MERGER AND RESUBDIVISION OF PARCEL 2023-25 & PARCEL 2023-27 OF RECORD OF SURVEY MAP NO. 138189, AND PARCEL 2017-E1 OF RECORD OF SURVEY MAP NO. 127033. SITUATE WITHIN A PORTION OF SECTIONS 10, 15, & 16, TOWNSHIP 19 NORTH, RANGE 22 EAST, M.D.M.

STOREY COUNTY NEVADA

DOWL
5510 LONGLEY LANE
RENO, NEVADA 89511
(775) 851-4788

JOB NO:	30681	DRAWN BY:	MC	DRG NO:	0001
DATE:	01/2024	CHK'D BY:	MS	SHEET:	4 OF 5

Exhibit D



Concept Plan Note:
This concept drawing is for preliminary design purposes only. The data shown hereon is based on approximate horizontal and vertical data and should not be relied upon for accuracy. This is not a boundary survey and should not be relied upon as such.

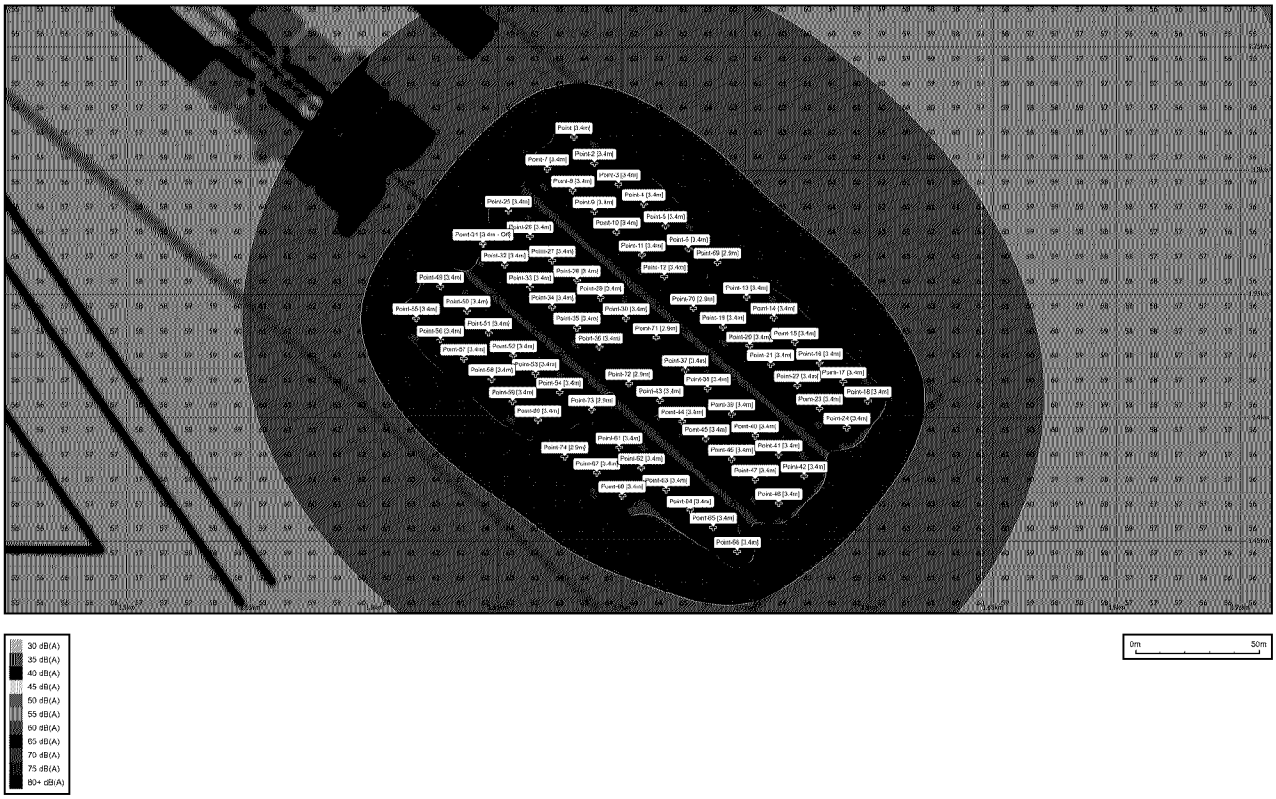
Exhibit E

Noise Mapping Results

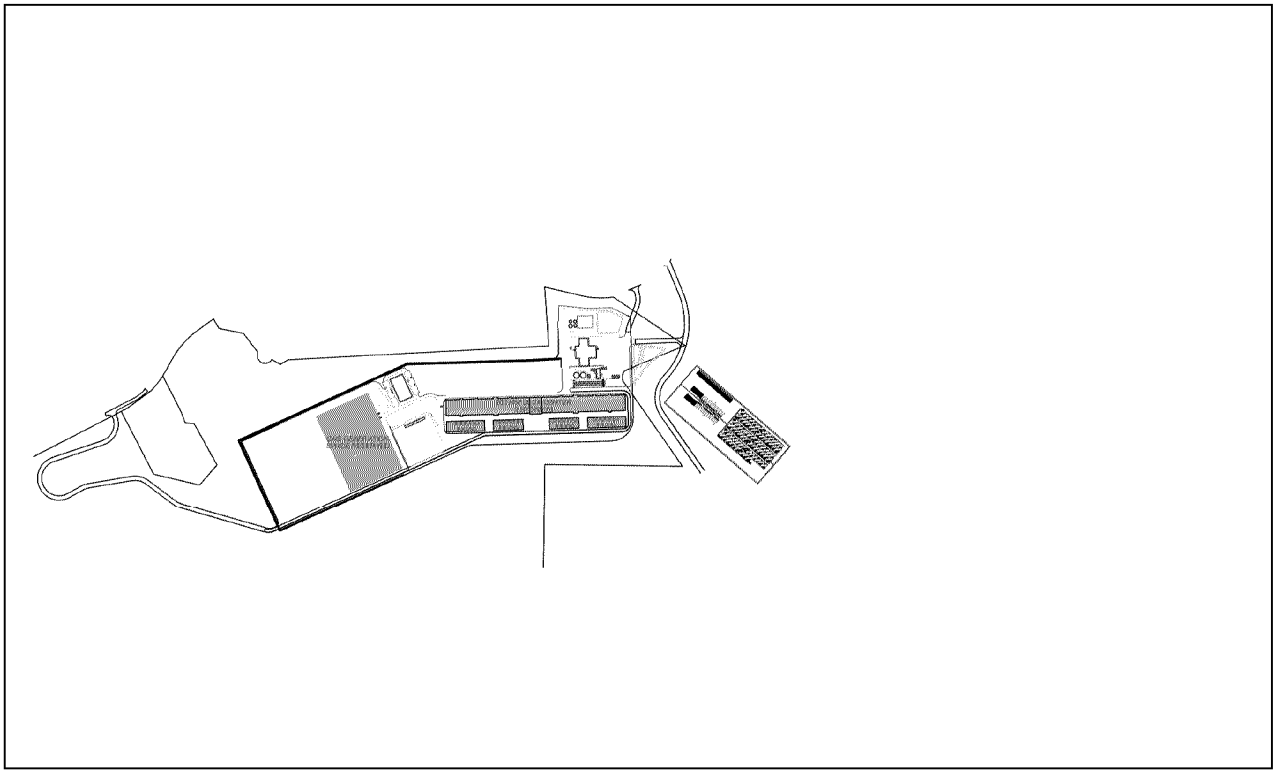
Report

February 2, 2026

Noise Map - Noise map height 1.5m (A-weighted)



Model Overview



Configuration

Calculation Method ISO96132:2024 (New)

Hard Ground (Ground Factor = 0)

15.0°C Temperature

70% Humidity

Results are A-weighted

Results are rounded to 0 decimal places

Second order reflections are included

Reflections are only considered at a distance of 1m or greater from a reflector (facade level)

ISO9613-2 barrier attenuation limit (20/25dB) is enabled

Vertical edges (lateral paths) are included

Limited to convex paths

Limited in distance (ISO17534-3 recommendation)

Ground reflections are not screened (ISO17534-3 recommendation)

References

ISO 9613-1:1993 — Attenuation of sound during propagation outdoors — Part 1: Calculation of the absorption of sound by the atmosphere

ISO 9613-2:2024 — Attenuation of sound during propagation outdoors — Part 2: Engineering method for the prediction of sound pressure levels outdoors

ISO/TR 17534-3:2015 — Acoustics — Software for the calculation of sound outdoors — Part 3: Recommendations for quality assured implementation of ISO 9613-2 in software according to ISO 17534-1. Quality Assurance and Test Cases: https://dbmap.net/iso17534results

Exhibit F



PR RNO Property Owner 1, LLC

Environmental Statement

Peru Ridge Gas Power Generation Facility,

Storey County, NV

Date: April 10, 2026

717 Market Street, Suite 400
San Francisco, CA 94103
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PR RNO Property Owner 1, LLC

Environmental Statement

Peru Ridge Gas Power Generation Facility, Storey County, NV

Date: April 10, 2026

Prepared for:

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Appendices

Appendix A Approved Jurisdictional Determination (AJD)

Acronyms

Acronym	Definition
AADT	Average annual daily traffic
Aggreko	Aggreko, LLC
AJD	Approved Jurisdictional Determination
APN	Assessor's Parcel Number
Applicant	PR RNO Property Owner 1, Limited Liability Corporation
ASCE	American Society of Civil Engineers
amsl	Above mean sea level
BAPC	Bureau of Air Pollution Control
BGEPA	Bald and Golden Eagle Protection Act
bgs	Below ground surface
BMP	Best management practices
CAA	Clean Air Act
CFR	Code of Federal Regulations
CNG	Compressed Natural Gas
CO	carbon monoxide
CWA	Clean Water Act
Data Center	TRI Architectural Review Committee Review
DVT	daily vehicle trips
dB	decibels
dBA	A-weighted decibels
DVT	daily vehicle trips
EPA	U.S. Environmental Protection Agency
ES	Environmental Statement
ESA	Endangered Species Act
°F	Degrees Fahrenheit
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
HA-83	Tracy Segment Hydrographic Area
HA-102	Churchill Valley Hydrographic Area
I-80	Interstate 80
IPaC	Information for Planning and Consultation
kV	kilovolt
LLC	Limited Liability Corporation
L_{max}	maximum instantaneous noise level
LOS	Level of Service
MW	Megawatt

NAAQS	National Ambient Air Quality Standards
NAC	Nevada Administrative Codes
NDEP	Nevada Department of Environmental Protection
NDNH	Nevada Division of Natural Heritage
NDOT	Nevada Department of Transportation
NDOW	Nevada Department of Wildlife
NDWR	Nevada Division of Water Resources
NO_2	nitrogen dioxide
NO_x	Nitrogen oxide
NRS	Nevada Revised Statues
NV Energy	Nevada Energy
O&M	operations and maintenance
O_3	ozone
Pb	lead
PM	particulate matter
Project	Peru Ridge Gas Generation Project
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
PUCN	Public Utilities Commission Nevada
RCRA	Resource Conservation and Recovery Act
SAD	Surface Area Disturbance
SCR	Selective Catalytic Reduction
SF_6	sulfur hexafluoride
SHPO	State Historic Preservation Office
SO_2	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasures
SWPPP	Stormwater Pollution Prevention Plan
TNW	Traditional Navigable Waters
TRI Center	Tahoe-Reno Industrial Center
TRI-GID	Tahoe Reno Industrial General Improvement District
TRINA	Traffic Records Information Application
typ	Tons per year
UEPA	Utility Environmental Protection Act
USA Parkway	USA Parkway/Nevada State Route 439
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VOC	Volatile organic compounds
WEAP	Working Environmental Awareness Program

$\mu g/m^3$	Micrograms per cubic meter

1 Introduction

1.1 Project Background

PR RNO Property Owner 1, Limited Liability Corporation (Applicant) is proposing to install a temporary natural gas power generation facility for the purposes of providing power to an onsite data center in accordance with the adopted I-2 Heavy Industrial zone classification (Storey County Code of Ordinances Title 17, Chapter 17.35) and the Tahoe Reno Industrial Center (TRI Center) Master Plan on Storey County Assessor's Parcel Number (APN) 005-011-94.

The Project includes the construction of 218 megawatt (MW) capable power generation system using 136 Jenbacher J420 engines. The system would also have 12 Volvo Penta Model TWD1683GE black start engines to assist with system startup. The J420 engines would run on natural gas supplied through a Compressed Natural Gas (CNG) delivery system. The CNG would be transported to the site using mobile CNG containers and stored onsite until use. Once the mobile tank is empty, it would be removed from the site and replaced by a filled incoming mobile tank. The delivery of CNG to the site occurs adjacent to the power generation sites.

The power generation facility would be located on approximately 23.4 acres of privately owned land to be built, owned, and operated by the Applicant. The power system is anticipated to be in operation for 2 to 3 years and would be operated and maintained by Aggreko, LLC (Aggreko). The power system would be temporary until Nevada Energy (NV Energy) can deliver the required power to the data center. The power from this system would be non-grid connected and would only provide power to the data center. CNG delivery and mobile storage would be handled by Certarus.

1.2 Project Purpose and Need

The Project would provide the necessary electrical power to service the new Peru Ridge Data Center electric loads. The need for the temporary power system is warranted as data center growth is outpacing the ability for NV Energy to supply power in new areas. This power system is expected to be in use for 2 to 3 years and would cease operation once NV Energy delivers power to the site.

1.3 Authorizing Actions

The Utility Environmental Protection Act (UEPA) was enacted in 1971 to address environmental issues related to the construction of utility facilities. UEPA permits granted by the Public Utilities Commission of Nevada (PUCN) apply to any new conventional power plant,

including temporary power. Since the Project includes a new 218 MW capable power plant using natural gas fired engines, a UEPA permit is needed. One component of the permit process is preparation of an Environmental Statement (ES). This ES evaluates the potential environmental impacts of the Project to be reviewed by the PUCN in compliance with UEPA.

The primary approval required for the Project would be issued by the PUCN. The PUCN would review the ES in accordance with UEPA guidelines. Should the Project be approved, the PUCN would issue an Order assessing compliance with UEPA guidelines and would subsequently issue a Permit to Construct after all necessary development approvals have been obtained from federal, State, and local agencies. The PUCN list of potential federal, State, and local permits was reviewed. Table 1 lists those permits that may be necessary for the Project for the PUCN to issue a Notice to Construct. These permits and requirements are typical and well understood for projects of this nature. Table 1 also lists the issuing agency for each permit and the anticipated completion date.

Table 1 Regulatory Permits and Approvals

Permit/Approval	Issuing Authority	Expected Date
Surface Area Disturbance (SAD) Permit	Nevada Department of Environmental Protection (NDEP), Bureau of Air Pollution Control (BAPC)	Q2 2026 (For Peru Ridge Data Center) Q1 2026 (For Peru Shelf grading at power site)
Nevada Construction Stormwater Permit	NDEP	Q2 2026 (For Peru Ridge Data Center Construction) Q1 2026 (For Peru Shelf grading at power site)
Class 1 OPTC Air Permit	NDEP	Q4 2026
Storey County Building Permit	Storey County	Q2 2026

1.4 Environmental Statement Organization

This ES is divided into the following sections:

- **1.0 Introduction**. Provides a brief general description of the Project and its purpose and need. The section also summarizes the Project location, the State and local reviews, regulatory approvals, and permits likely to be required.
- **2.0 Description of Proposed Action and Alternatives**. Describes the Project and provides a discussion regarding the consideration of alternatives.
- **3.0 Existing Setting, Environmental Consequences, and Mitigation Measures**. Describes the existing environment at and near the Project site. It also details the potential environmental consequences of the Project and mitigation measures designed to reduce, minimize, or avoid impacts so they are reduced to an

acceptable level. In addition, a table summarizing the potential effects, the recommended mitigation measures, along with the timing of those measures and identification of entities responsible for implementation and monitoring, has been included.

- **4.0 List of Preparers and Reviewers**. Lists people who contributed to the preparation and review of this ES.
- **5.0 References**. Lists references used in this ES.
- **Appendices**. Provides supplemental information.

2 Description of Proposed Action and Alternatives

2.1 Project Location and Access

The Project is located in Storey County, Nevada, approximately 22 miles east of the City of Reno in the TRI Center (refer to Figure 1). The Project is located on Storey County APN 005-011-94. The parcel fronts Peru Drive, a public dedicated roadway. Access to the Project site would be via Peru Drive.

2.2 Project Disturbance and Acreage

The Project site is approximately 23.4 acres (refer to Figure 2). Of the 23.4 acres, approximately 4.1 acres have been graded as part of the overall site development for a new data center, under existing grading permits from Storey County. Additional underground work may be necessary to construct the power station. The J420 engines and the CNG supporting equipment are mobile and would be easily moved into place for site operations.

Permanent disturbance would be limited to the gas generation facility and access road. Temporary disturbance would be limited to laydown and staging areas. Project disturbance calculations are shown in Table 2.

Table 2 Proposed Acres of Disturbance

Project Component	Proposed Disturbance (acres)	Existing Disturbance (acres)
Permanent Disturbance		
Gas Generation Facility	16.7	1
Access Road	2.1	1.1
Total Permanent Disturbance	**18.8**	**2.1**
Temporary Disturbance		
Laydown and Staging Areas	4.6	2
Total Temporary Disturbance	**4.6**	**2**
Total Surface Disturbance	**23.4**	**4.1**

Figure 1 Project Location

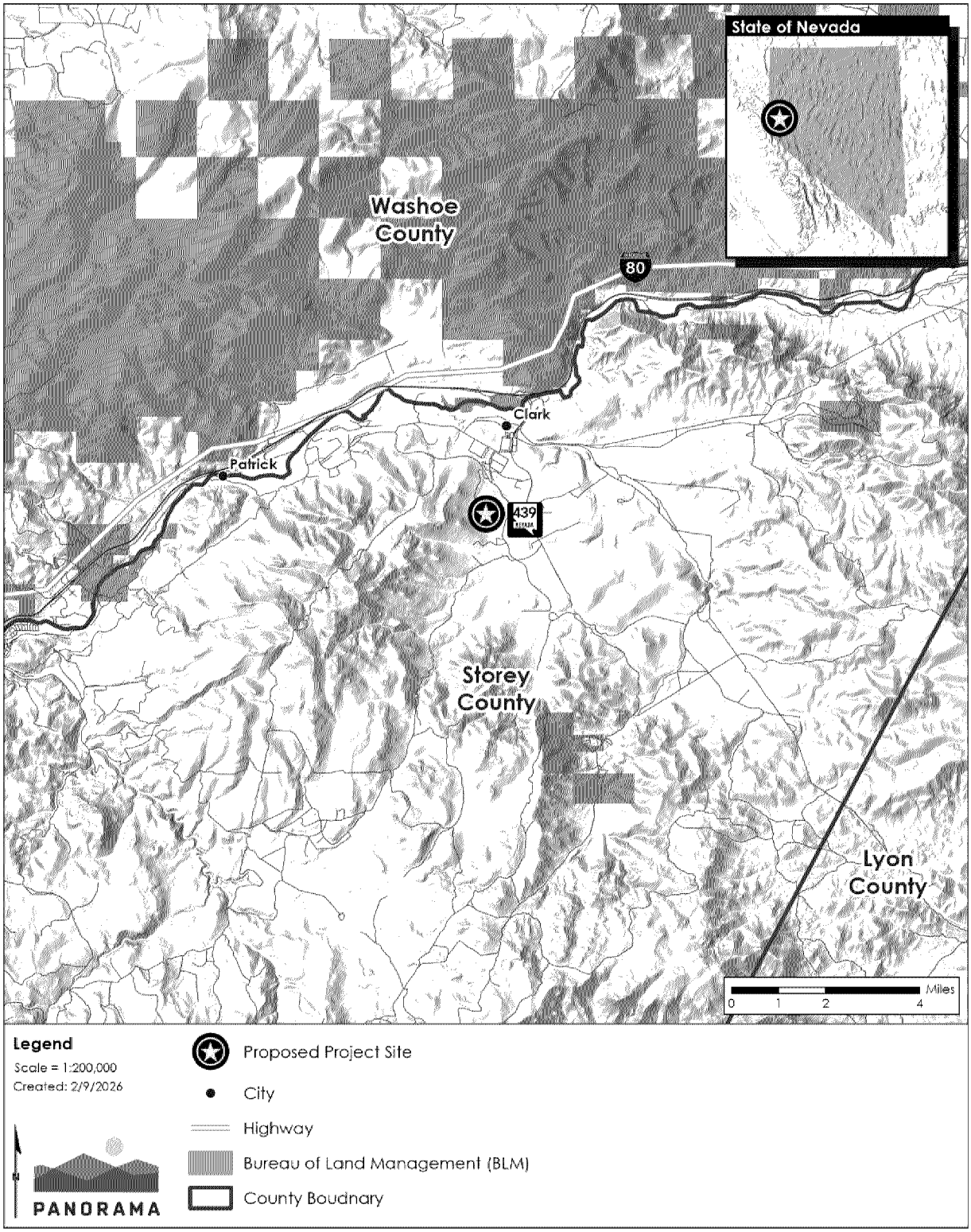


Figure 2 Project Site



2.3 Project Facilities

2.3.1 Peru Ridge Power Generation Equipment and Arrangement

Figure 3 shows the site plan for the Peru Ridge temporary power station. The Peru Ridge power facility's major equipment includes:

- 136 Jenbacher J420 engines
- 136 S elective Catalytic Reduction (SCR) air pollution controls for nitrogen oxide (NO_x), carbon monoxide (CO), and volatile organic compounds (VOCs)
- 12 Volvo Penta Tier 4 TWD1683GE diesel black start engines
- Six 1,240-gallon diesel tanks
- 72 medium voltage transformers
- 176 Mobile CNG tanks for Temporary Storage
- Natural gas piping to J420s from vaporizers
- Protection equipment
- All necessary appurtenances and devices
- Control and relay enclosures
- Utility trenches

2.3.2 Auxiliary Systems for Temporary Power Generation

Water

Water for construction and operations activities at the Project would be provided by the TRI Center water main along Peru Drive which fronts the Project site. The water main is managed and operated by the Tahoe Reno Industrial General Improvement District (TRI-GID).

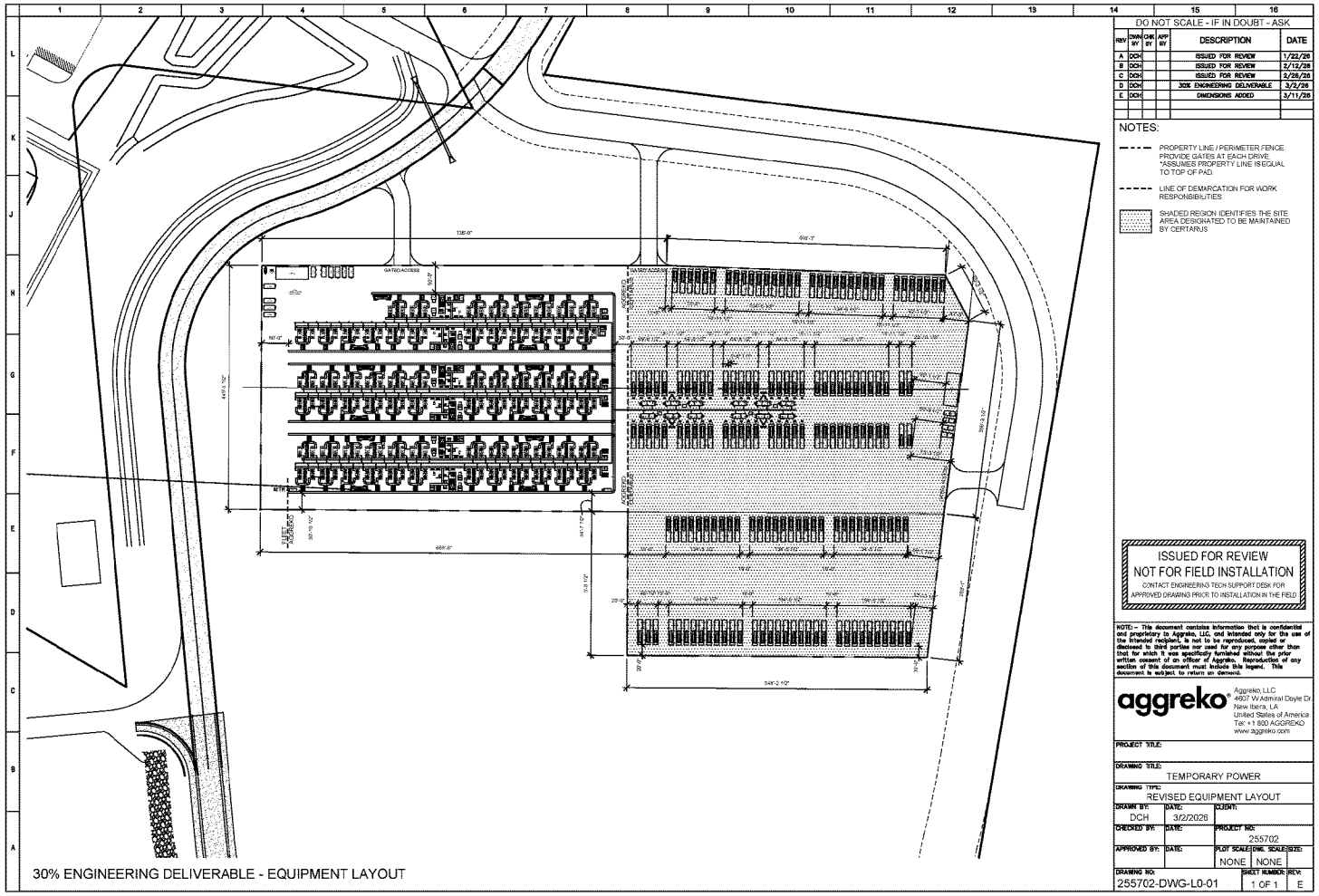
Lighting

The Project's lighting system would provide operations and maintenance (O&M) personnel with illumination for both normal and emergency conditions. Lighting would be designed to provide the minimum illumination needed to achieve safety and security objectives and would be downward facing and shielded to focus illumination on the desired areas only. If lighting at individual structures or equipment is needed for night maintenance, portable lighting would be used. Permanent lighting would be placed at the entrance and within the power generation facility for O&M and for safety purposes.

Site Access Roads, Fencing, and Security

Access to the Peru Ridge temporary power generation facility would be via Peru Drive and local access roads. The power generation site is located inside the Peru Ridge Data Center fence line.

Figure 3 Temporary Gas Power Generation Facility Site Plan



The perimeter of the temporary power generation facility would be enclosed by an 8-foot-high expanded metal fence. Access to the power generation system would be controlled (authorized personnel only) using a fence. Select gates would feature provisions to facilitate emergency access for fire department vehicles and truck delivery vehicles. The surrounding data center also has a security fence and would be staffed 24/7.

Approximately 170 heavy-duty trucks would deliver the J420 engines and associated equipment to the Project site. This would be a one-time occurrence, and trucks would use the same route to access the facility.

The CNG delivery center would be located adjacent to the power generation facility. CNG truck deliveries would occur approximately 20 times per day. The site would use a 24-hour delivery window.

2.4 Construction

2.4.1 Site Drainage

The temporary power facility would include a site drainage system consisting of stormwater drainage channels and conveyance piping to a site outfall. The site outfall would remove stormwater from the site and transport it to drainage channels along Peru Drive. Storey County has approved the stormwater drainage systems for the parcel encompassing the power and data centers. Figure 4 shows the drainage plan for the Temporary Gas Generation Pad.

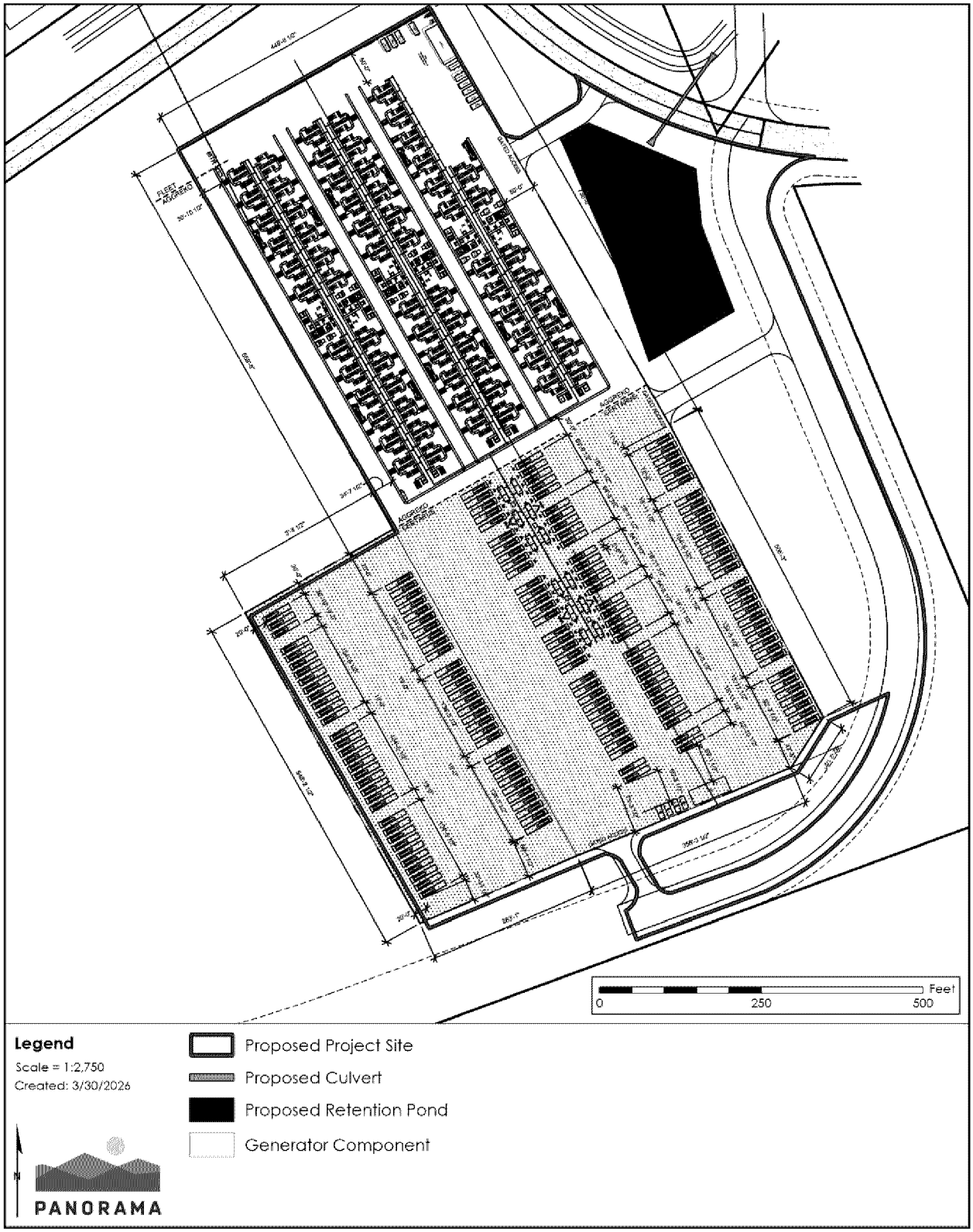
Any additional drainage features would be incorporated into the design of the facility in accordance with the Storey County requirements. The site is classified as an "area of minimal flood hazard" and is not within the 100-year flood event zone. Onsite and offsite drainage has been coordinated with Storey County Engineering.

2.4.2 Clearing and Grading

Peru Ridge Temporary Power Facility

Approximately 3.1 acres of the Peru Ridge temporary power station area have been graded and leveled under the grading permit received from Storey County for the overall data center project. Surrounding the Project footprint, the plant communities and habitat types are characterized by Sagebrush and Invasive Annual Grassland habitats, but much of the area has already been disturbed by industrial development and Master Planned improvements. Final grading and removal of stockpiled soils would take place prior to construction of the power generation facility.

Figure 4 Temporary Gas Power Generation Pad Drainage Plan



2.4.3 Assembly and Construction

Peru Ridge Temporary Power Facility

The Peru Ridge temporary Power facility would be constructed in compliance with applicable electrical safety codes. The power generation and support equipment are designed to be mobile and require little infrastructure preparation. The CNG storage areas will be designed on a concrete pad, and the engines will include a gravel base. Power transmission to the data center substation would occur using above ground transmission cables.

Containment measures for all power generation facility equipment would be provided in accordance with the U.S. Environmental Protection Agency (EPA) 40 Code of Federal Regulations (CFR) Part 112 and all applicable codes required by the local, State, and federal governing authorities. Transformers would be provided with secondary oil containment equal to 110 percent of the volume of oil present in the transformer in addition to the volume of rainwater for a 25-year, 24-hour rainfall event.

CNG Delivery

The CNG tanks would meet FMVSS 394 and similar performance requirements for holding high pressure CNG. The tanks are designed to be mobile and can be placed on the site with little to no ground preparation.

Construction would be minimal to install the temporary power generation facility. The equipment required includes, but is not limited to, pick-up trucks, haul trucks, bucket trucks, graders, compactors, cranes, a puller and tensioner, a reel trailer, a splice trailer, and air compressors.

Laydown Areas, Staging Areas, Work Areas, and Stringing Sites

The laydown and contractor staging area for the Peru Ridge temporary power facility would be on graded land just west of the data center site. This area would also be where the contractor site trailers/offices as well as fabrication areas, worker break area, sanitation and parking, material staging area, and storage (CONEX) boxes would be located. This area would cover up approximately 4.6 acres. Temporary power for the main laydown area would be provided by NV Energy and/or mobile generator(s). Potable water for drinking and sanitation would be provided from the water main on Peru Drive. Temporary construction areas, including laydown yards, staging, and work areas are shown in Figure 2.

Restoration

The permanent and temporary use areas would be restored. All construction material and debris would be removed and disposed of at appropriate permitted landfills. All temporary work areas would be recontoured to preconstruction conditions when feasible and stabilized using a seed mix that is representative of the surrounding vegetation community.

2.4.4 Construction Schedule

The Applicant expects to commence onsite construction in Q1 2027. The total construction period is estimated at 6 to 8 months. If sensitive environmental resources such as nesting birds

are encountered in preconstruction surveys or during construction, construction scheduling in those identified portions of the Project site may be modified to prevent impacts to sensitive species or sensitive habitat.

Construction is expected to be conducted up to 10 hours per day, 6 days per week. Typical construction work schedules are expected to be from 7:00 a.m. to 5:00 p.m., Monday through Saturday, which is within allowed hours of exemption from local noise ordinance restrictions. Storey County's noise exemption for construction activities is between 7:00 a.m. and 7:00 p.m., except Sundays and federal holidays.

Two phases of construction are planned:

1. **Final Grading/Temporary Construction Facilities**. Final grading of the pad for the Peru Ridge power station may be required but is expected to be minimal.
2. **Peru Ridge Temporary Power Facility.** Installing generation engines, breakers and transformers, protection equipment, control and relay enclosure, transmission line to data center substation and security fencing would occur next.

Once all equipment is put in place, system integration, final system checks and operational testing of the generators would begin. Once this step has been completed, regular CNG deliveries would begin to the site and ramp up as the data center is completed.

2.4.5 Construction Materials and Equipment

The following temporary construction facilities would be needed:

- Full-length trailer offices or equivalent
- Parking for construction worker vehicles
- Construction equipment parking
- Fueling area (diesel and gas)
- Chemical toilets
- Holding tanks and/or temporary septic system
- Tool sheds/containers
- Covered assembly area
- Diesel power generator(s)

Construction materials, such as concrete, pipe, wire and cable, fuels, reinforcing steel, and small tools and consumables, would be delivered to the site by truck. Initial minimal grading work on the power generation facility area would include the use of excavators, graders, dump trucks, and end loaders, in addition to support pickups, water trucks, and cranes. Use of the following equipment is anticipated:

- Scraper(s)
- Concrete truck(s)
- Motor grader(s)
- Backhoe/loader(s)
- Excavator(s)

- Truck-mounted crane(s)
- Dozer(s)
- Grader-all(s)
- Dump truck(s)
- Flatbed truck(s) for pre-cast foundations
- Pad drum vibrato roller(s)
- Trencher(s)
- Water truck(s)
- Lightweight truck(s).

2.4.6 Construction Personnel

The onsite construction workforce would consist of laborers, craftsmen, supervisory personnel, support personnel, and construction management personnel. The workforce needed for the Project would vary during construction. The peak personnel during construction are estimated to be around 20 people, with average manpower of approximately 15 per month.

2.4.7 Construction Waste Management

Overview

During construction, the primary waste generated would be solid non-hazardous waste. However, some non-hazardous liquid waste and hazardous waste (solid and liquid) would also be generated. All the waste generated by the Project would be contained at the Project site. The types of waste potentially generated during construction are described in the following discussion.

Non-Hazardous Solid Waste

Project construction could potentially generate the following non-hazardous waste streams:

- **Paper, Wood, Glass, and Plastics.** This waste is typically generated from packing materials, waste lumber, insulation, and empty non-hazardous chemical containers. This waste would be recycled to the extent practical. Waste that cannot be recycled would be disposed of weekly at an appropriately licensed landfill. Onsite, the waste would be placed in dumpsters.
- **Metal.** Metal waste that includes steel (from welding and cutting operations, packing materials, and empty non-hazardous chemical containers) and aluminum waste (from packing materials and electrical wiring) would be generated during construction. Metal waste would be recycled where practical and non-recyclable waste would be deposited in an appropriately licensed landfill.

Hazardous Waste

Most of the hazardous waste generated during construction would consist of lubricants, cooling fluids, oily rags, and solvents. Some hazardous solid waste, such as welding materials and dried paint, may also be generated during construction. In the event there are spills at the site, they would be cleaned up, and contaminated soil waste may be generated. Spill cleanup kits

would be available on construction vehicles so that spills or leaks of vehicle fluids could be quickly cleaned up for proper disposal. The quantity of hazardous waste is expected to be minimal.

Wastewater

During construction, wastewater would be collected in self-contained systems that would be pumped and disposed of in accordance with local requirements. Wastewater generated during construction would include sanitary waste and equipment wash-down water. These waters may be classified as hazardous or non-hazardous depending on their chemical quality and would be handled and disposed of in accordance with applicable laws.

2.4.8 Erosion and Sediment Controls

Water Erosion Control Measures

Due to the removal or disturbance of soil and vegetation during construction, appropriate water erosion and dust-control measures will be required to minimize dust and sediment load to water bodies. The Project would be subject to the NDEP Stormwater Construction Permitting and Stormwater Pollution Prevention Plan (SWPPP) requirements. The site is permitted as required for stormwater and a SWPPP will be developed, if required, before construction begins.

Best management practices (BMPs) and erosion-control measures will be implemented to control stormwater runoff. Site-specific BMPs will be implemented by the contractor in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control will be implemented:

- All site BMPs such as silt fencing, construction access controls, concrete washout devices, fuel secondary containment structures and other required measures will be put in place before construction begins.
- The weather will be monitored using National Weather Service reports during construction to track conditions and alert crews to the onset of rainfall events.
- Existing vegetation will be preserved where feasible. Clearing and grading will be conducted only in areas necessary for Project activities and equipment traffic. Temporary fencing or signage will be installed prior to construction along the boundaries of the construction zone to clearly mark this zone, preventing vehicles or personnel from straying onto adjacent offsite habitat.
- Construction activities will be sequenced with the installation of erosion control and sediment control measures. The construction schedule will be planned as practicable to leave existing vegetation undisturbed until grading begins.
- Non-active areas will be stabilized as soon as feasible on those portions of the Project site where construction has temporarily or permanently ceased.
- Covers will be placed over stockpiles prior to forecasted storm events and during windy conditions as necessary to prevent erosion of stockpiles. Sediment controls

will be placed (such as fiber rolls, straw bales, silt fencing) around the perimeter of stockpiled materials to control sediment runoff.
- Sufficient erosion control materials will be placed onsite to allow implementation of BMPs. This measure includes implementation requirements for active areas and non-active areas that require deployment before the onset of rain.
- Controls will be repaired and reapplied according to BMPs in areas where erosion is evident.

Wind Erosion Control Measures

The Project will implement the following practices for wind erosion control:

- Vegetation removal and grading will be minimized to the extent practicable.
- Water or dust palliatives will be applied to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction as required by the NDEP SAD permit. Water will be applied using water trucks. Water application rates will be minimized as necessary to prevent runoff and ponding.
- During windy conditions, including forecast or actual wind conditions of approximately 25 miles per hour or greater, dust control will be applied to haul roads to adequately control wind erosion. Exposed stockpiled material areas will be covered.
- Excavation and grading will be temporarily suspended during periods of high winds when dust cannot be reasonably controlled.
- All trucks hauling soil and other loose materials will be covered or at least 2 feet of freeboard will be maintained.

2.5 Operation and Maintenance of Power Generation Facility

2.5.1 Operation and Maintenance Protocol

O&M activities would be managed and performed by Aggreko with a team of highly qualified technicians. All operations within the Peru Ridge power generation site would follow the appropriate safety protocols. All station personnel would be certified as capable of performing the operations and of receiving and executing all maintenance activities in accordance with company and manufacturer procedures. The Peru Ridge power generation site would be monitored and controlled onsite. Operators would be on site to complete maintenance requirements periodically.

Maintenance would be performed as indicated in Table 3.

Table 3 Routine Maintenance Protocol

Component	Frequency	Task
Station transformers	Semi-annually	• Inspect access doors/seals • Inspect electronics enclosure and sensor wiring

Component	Frequency	Task
		• Record all gauge readings
	Annually	• Inspect fans for proper operation • Calibrate temperature and pressure sensors • Pull oil sample for oil screening and dissolved gas analysis
Breakers and switchgear	Semi-annually	• Inspect for discoloration of equipment and terminations • Inspect door seals
	Annually	• Check open/close operation
Transmission lines	Annually (and after heavy rains)	• Inspect guy wires and tower angle • Visual inspection of supports/insulators • Visual inspection for discoloration at terminations
Site Integrity	Monthly	• Inspect site and roads for erosion • Inspect site monthly for any ground contamination from petroleum compounds as directed by site Spill Prevention, Control, and Countermeasure (SPCC) Plans • Inspect engines and associated equipment weekly for oil or condensate leakages • Ensure site drainage is working as intended to minimize any standing water around electrical equipment • Ensure any maintenance activities on engines would be performed in a manner that would avoid ground contamination from oils, coolant, or any other chemicals
Engines	As needed	• Monitor and perform any maintenance as required to support 24/7 engine operations • Maintain run logs for all engines and air pollution control equipment collecting information required by the air permits • Maintain SCRs as required to ensure emission reduction performance is maintained as required • SCRs would always operate when the associated engines are operating • Fuel use for all generating operations would be continuously monitored for air permit compliance

2.5.2 Waste Management

Overview

The primary waste generated at the Project site during operations would be non-hazardous solid waste. However, varying quantities of liquid non-hazardous waste and solid and liquid hazardous waste would also be generated. The types of waste and their estimated quantities are discussed in the following subsections.

Non-Hazardous Solid Waste

The Project would produce non-hazardous waste, including rags, broken metal, and machine parts, defective or broken electrical materials, empty containers, and typical refuse generated by site operations, and other miscellaneous solid waste. Large metal parts would be recycled. Other non-hazardous waste would be disposed of in an appropriately licensed landfill. Refuse and trash would be removed from the sites and disposed of in an approved manner.

Hazardous Waste

Limited quantities of hazardous materials would be used onsite for O&M that may require disposal as hazardous waste. These materials would include oils, diesel fuel, lubricants, solvents, galvanized paint, mineral insulating oil, janitorial supplies, office supplies, laboratory supplies, degreasers, herbicides, pesticides, coolant, air conditioning fluids, gasoline, hydraulic fluid, propane, and welding rods. These materials would generally be used in small quantities. Due to the small quantities involved, spills are expected to be cleaned up without resulting in any considerable environmental consequences. Oils or chemicals would be hauled to an approved site for disposal. Spill cleanup kits would be available on equipment so that spills or leaks of onsite tanks, engines or vehicle fluids could be quickly cleaned up for proper disposal. All diesel fuel tanks onsite are double walled with built-in secondary containment.

2.5.3 Health and Safety

The health and safety of employees and contractors is a high priority. All employees and contractors at the site would be required to adhere to the appropriate health and safety plans and emergency response plans adopted by PR Power I for construction, operation, and maintenance of the contemplated utility infrastructure. All construction and operation contractors would be required to operate under a health and safety program that meets industry standards.

2.5.4 Site Security and Lighting

The Peru Ridge power operations would be secured with an 8-foot expanded metal fencing. Lighting would be provided at the site and entrance to the site. A perimeter security system would also be installed around the facility.

2.6 Alternatives Considered but Eliminated from Detailed Consideration

Potential alternatives for the Project were evaluated to determine whether they could substantially achieve the Project goals and objectives to be considered feasible and appropriate for further consideration. The primary purpose of the Project is to provide reliable, onsite power generation to support the Peru Ridge Data Center campus. Because the Peru Ridge power generation facility is in the data center campus, and is centrally located to serve campus electrical demand, alternative locations either within or outside the Peru Ridge property would not meet the operational objectives of the Project. Relocating the facility would increase transmission distances, reduce system efficiency, and potentially require additional infrastructure, resulting in greater environmental disturbance and higher costs. The selected site

is the most suitable location for the power generation facility within the Peru Ridge potential environmental impacts. The facility is sited to minimize the length of interconnection facilities to the Peru Ridge Substation and efficiently serve campus electrical demand. No feasible alternative locations or configurations were identified.

3 Existing Setting, Environmental Consequences, and Mitigation Measures

3.1 Introduction

The Project is within the TRI Center, approximately 22 miles east of Reno, in Storey County, Nevada. The following resources are analyzed in this ES:

- Geology, Soils, and Paleontology (Section 3.2)
- Water Resources (Section 3.3)
- Air Quality (Section 3.4)
- Biological Resources (Section 3.5)
- Cultural Resources (Section 3.6)
- Land Use (Section 3.7)
- Transportation (Section 3.8)
- Visual Resources (Section 3.9)
- Noise (Section 3.10)
- Waste Management (Section 3.11)
- Socioeconomics (Section 3.12)
- Fire Management (Section 3.13)

3.2 Geology, Soils, and Paleontology

3.2.1 Existing Setting

The Project is in northwestern Nevada within hills of the Virginia Range, a collection of mountain peaks formed by basaltic and andesitic lava flows that occurred in the Tertiary period, approximately 66 million years ago. The Virginia Range lies within the Basin and Range physiographic province and is characterized by high-angle extensional normal faults trending north and northeast. Sediment at the Project site is comprised mainly of alluvial fan material because of weathering from the surrounding peaks. The Project site is on a sloping hillside at approximately 4,700 feet above mean sea level (amsl). The geologic deposits that can be found in the Project vicinity include Quaternary-aged alluvium and Kate Peak Formation, a porphyritic andesite (Robert L. Rose 1969).

Soils within the Project site are 100 percent comprised of Grumblen-Ceejay Dorkiss association. These soil units are generally comprised of gravelly loam, gravelly clay loam, and bedrock (NRCS 2026). These soils are characterized by very gravelly loam and very gravelly clay loam surface horizons underlain by shallow lithic bedrock. Cobbles and boulders are common

throughout the map unit, with approximately 10 percent surface cover of coarse fragments. Depth to lithic bedrock typically ranges from 14 to 20 inches, and the underlying bedrock is expected to be moderately to highly weathered. The soil has a low infiltration rate due to the clay content, which indicates high runoff potential and erosion susceptibility on slopes between 15 to 50 percent. Development of the power generation facility would require final grading.

The nearest mapped faults are within the Historic-aged (greater than 150 years old) Olinghouse fault zone trending east-west approximately 3.6 miles north of the Project site (Nevada Bureau of Mines and Geology 2025). According to the U.S. Geological Survey (USGS), probabilistic seismic hazard analysis, the probability of an earthquake of magnitude 6.5 or greater occurring within 30 miles in 50 years is approximately 50 percent for the Project site; therefore, earthquakes and associated impacts should be expected during the life of the Project (Nevada Bureau of Mines and Geology 2006).

A geotechnical field exploration was completed by Westex Consulting Engineers in February 2025 and consisted of 18 exploratory borings drilled near the Project site, drilled to a maximum depth of 96 feet below the surface. Of the 18 exploratory borings, three are located adjacent to the Project site and are therefore representative of site conditions. Visual observation of surface rock consisted of major basalt flows and volcanic trap rock in the form of cobbles and boulders (Westex 2025). Drilling revealed harder, denser material ranging from 10 to 35 feet below the surface. The native granular soils and rock found onsite are considered suitable for use as properly compacted structural fill, provided any debris, vegetation, and/or oversized material are removed from the appropriate layers (Westex 2025).

The total Project site encompasses approximately 23.4 acres. Of this area, approximately 4.1 acres have previously been graded as part of the overall site development for the data center under existing grading permits issued by Storey County.

The Project vicinity is located on unconsolidated alluvium/colluvium of indeterminate, but most likely Quaternary age. Such strata are usually devoid of fossils and paleontological resources. The probability of finding significant paleontological resources at a given location can be estimated based on previous records recovered from the geologic units present in the area. The fossil record for the TRI Center indicates that the Project site is in an area with variable sensitivity for paleontological resources ranging from low to medium and increases with depth due to the underlying geologic conditions and the prior grading that has occurred across approximately 4.1 acres of the site, the potential to encounter intact paleontological resources within previously disturbed areas is considered low. Due to the underlying geology and previous grading that has occurred at the Project site, it is unlikely that paleontological resources would be encountered.

3.2.2 Environmental Consequences

Soils and Soil Hazards

Soils in the Project site or characterized by relatively low infiltration rates due to their clay content, resulting in higher runoff potential and increased susceptibility to erosion. Of the approximately 23.4-acre Project site, approximately 4.1 acres have been previously disturbed through rough grading conducted under existing grading permits as part of the overall data center site development. These previously graded areas have already experienced soil disturbance and compaction.

Construction activities associated with final grading, installation of the power generation facility, and development of the access road would result in additional soil disturbance and could increase the potential for wind and water erosion, particularly in temporarily exposed areas and in remaining undisturbed portions of the site. BMPs for erosion and sediment control, wind erosion prevention, and dust control would be implemented during construction to minimize soil loss and offsite transport of sediments.

During operation, impacts to soils and soil related hazards would be minimal, as soil disturbance would be limited primarily to infrequent maintenance activities of the access road.

Geologic Hazards

Due to the high likelihood of earthquakes occurring in the vicinity of the Project site, impacts associated with ground-shaking should be expected during operation of the Project. During construction and operation, ground-shaking could damage Project infrastructure and lead to temporary power outages; however, adherence to the American Society of Civil Engineers (ASCE) Code and design guidelines would minimize earthquake and fault hazards by providing engineering criteria needed to ensure the infrastructure can withstand the expected maximum seismic forces.

Paleontology

Potential impacts to paleontological resources from Project construction could include disturbing buried fossils or other paleontological resources during road construction, grading, and installation of utility poles. Although the discovery of paleontological resources is unlikely due to the underlying geology, mitigation measures including training onsite personnel on procedures to be followed in case of an inadvertent discovery, would minimize potential impacts. No impacts on paleontological resources are anticipated during operation as no knew ground disturbance would occur.

3.2.3 Mitigation Measures and Resource Protection Measures

Soils and Soil Hazards

Wind erosion, water erosion, and dust-control measures will be incorporated by construction crews to mitigate potential soil impacts. A complete list of wind erosion BMPs are listed in Section 3.4, Air Quality, and water erosion BMPs are listed in Section 3.3, Water Resources. These BMPs, including silt fencing, construction access controls, concrete washout devices, fuel

secondary containment structures and other required measures, will be put in place before construction begins. Vegetation removal and grading will be minimized to the extent practicable, and water or dust palliatives will be applied to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction. Water application rates will be minimized as necessary to prevent runoff and ponding. During windy conditions, including forecast or actual wind conditions of approximately 25 miles per hour or greater, dust control will be applied to haul roads to adequately control wind erosion. Exposed stockpiled material areas will be covered.

Due to permanent site disturbance totaling approximately 18.7 acres, implementation of wind erosion and water erosion BMPs, and implementation of dust control measures, the impact on soils will be minor.

Geologic Hazards

The Project will be constructed to meet the safety standards listed in the ASCE Code and design guidelines, which provide engineering criteria needed to ensure the infrastructure can withstand seismic forces.

Due to the adherence of ASCE Code, design guidelines, and geotechnical recommendations, the impacts on geology and from geologic hazards will be minimized.

Paleontology

Should fossils or paleontological resources be encountered during construction of the Project, the Applicant's environmental inspectors and/or contractor personnel will be responsible for reporting all discoveries. Workers would attend environmental awareness training prior to construction. The following topics will be addressed in the training: how to recognize a fossil, the procedures to be followed if a discovery is made, understanding of what a fossil represents, and under what circumstances it is acceptable to disturb a fossil (e.g., as part of an emergency recovery procedure). With these measures, the impact on paleontology will be less than significant.

3.3 Water Resources

3.3.1 Existing Setting

Regulations

The Clean Water Act (CWA) (33 U.S.C. §1251–1376) is the primary federal law regulating water quality across the United States. Its main goal is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." In Nevada, the US EPA has delegated implementation authority to NDEP, which oversees compliance and assigns responsibilities to the owners, managers, and operators of public water systems. The Nevada Division of Water Resources (NDWR), under the direction of the State Engineer, manages both surface and groundwater resources, including the review and administration of water right applications

and appropriations. Wetlands receive further protection under Executive Order 11990, *Protection of Wetlands.*

The U.S. Army Corps of Engineers (USACE) is responsible for governing activities involving the discharge of materials and the modification of navigable waters and wetlands, ensuring compliance with the CWA (33 U.S.C. §1344) and the Rivers and Harbors Act (33 U.S.C. §403), as codified in 33 CFR Parts 320–332 and 40 CFR Part 230.

Groundwater

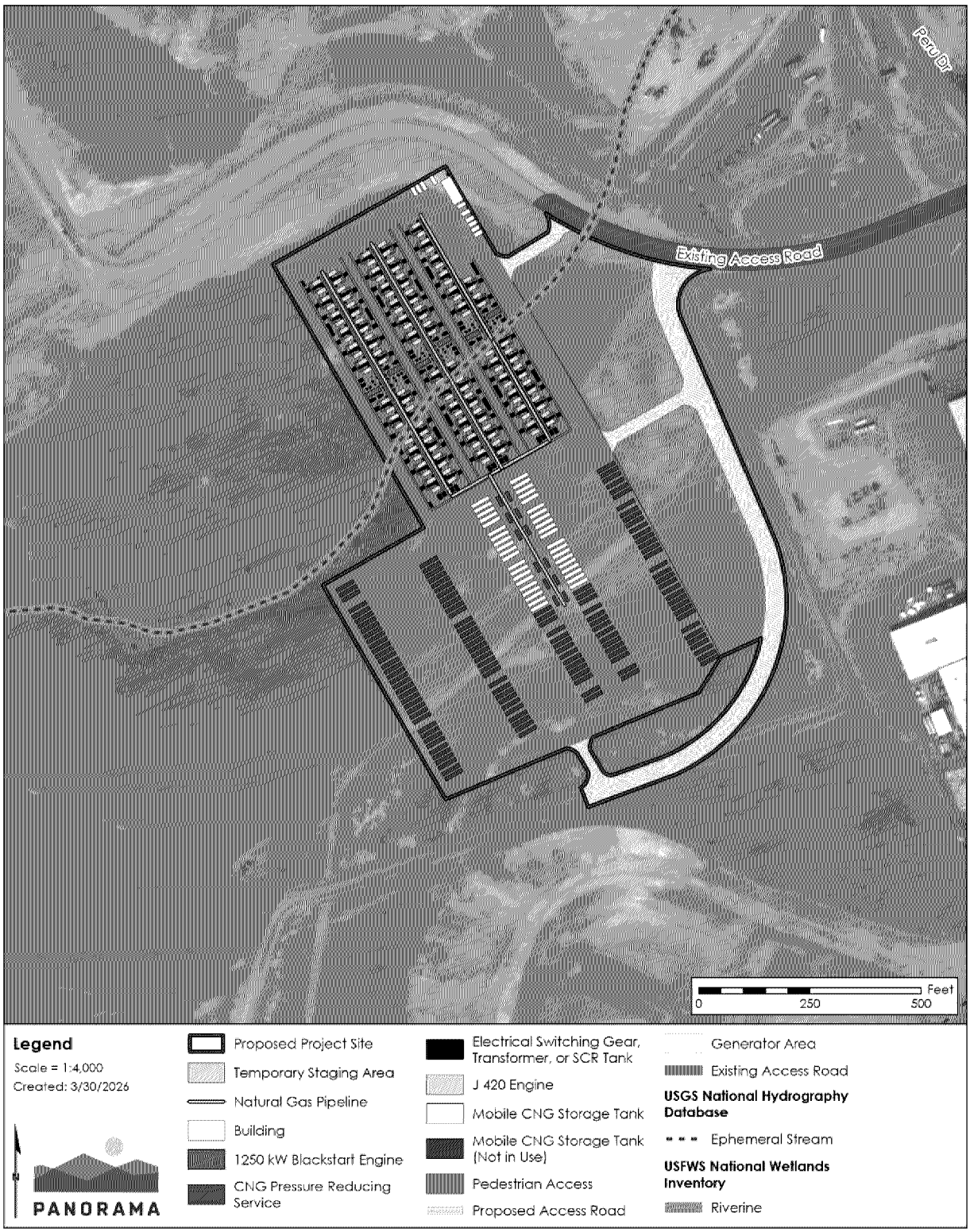
The average annual precipitation in the Project site is approximately 10 inches with higher elevations in the region receiving between 12 to 15 inches of precipitation annually. Annual recharge within Storey County is variable due to several factors including steep topography, low soil permeability, and sparse vegetation. In the summer, sporadic rainstorms contribute approximately 25 percent of the annual precipitation, whereas winter storms are the primary source of upslope recharge (UES 2024b). Only limited groundwater data is publicly available within the vicinity of the Project site; however, the depth to groundwater is estimated at approximately 95 to 150 feet below ground surface (bgs) (NDWR 2025).

Surface Water

An initial surface water desktop review was conducted for the Project site using the USGS National Hydrography Dataset and the U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory. One aquatic feature was identified as intersecting the Project site (Appendix A), as shown in Figure 5. Field surveys for an aquatic resource delineation were conducted by UES in 2024 for the adjacent Peru Shelf project and included the Project site. The aquatic feature identified in the desktop review was determined to lack characteristics indicative of surface water presence, and field verification for the Peru Shelf project confirmed that no surface water resources are present in this area. Aquatic resources in the vicinity of the Project site were determined to be non-jurisdictional waters under the CWA, as outlined in the Approved Jurisdictional Determination (AJD) issued by the USACE on June 10, 2024 (Appendix A). Field surveys for the adjacent Peru Shelf project determined the aquatic resources are ephemeral with no connection to Traditional Navigable Waters (TNW). The nearest TNW is the Truckee River, located approximately one mile downstream (northeast). Although the identified aquatic feature is not jurisdictional, it has been previously modified and redirected to the site's primary stormwater conveyance channel along the existing access road. Stormwater and water associated with power generation activities at the Project site would also be directed to this same channel for controlled conveyance. Given the adjacency of the Project to the Peru Shelf project, the same findings of no jurisdictional would apply.

The Project site is located within the Federal Emergency Management Agency (FEMA) Zone X (unshaded), which is characterized as an area of minimal flood hazard with an annual flood risk of less than 0.2 percent and is outside the 100-year and 500-year floodplains (FEMA 2025).

Figure 5 Waterways in the Project Site



3.3.2 Environmental Consequences

Groundwater/Water Supply

Water supply for construction and operation would be sourced by the TRI Center water main located on Peru Drive, which fronts the Project site. The water would be distributed using water trucks. Most of the water use would be during construction of the distribution lines and to control dust and maintain optimum moisture levels for compaction as required by the NDEP BAPC SAD permit. Approximately 4.1 acres of the proposed power generation facility site is already graded as part of the larger data center campus project, but water would be used to minimize dust during construction of the power generation facility. Groundwater would not be impacted by construction since water would be supplied from an existing municipal/industrial retailer.

Once constructed, operation of the power generation facility and unpaved access road would not require sustained water use. The minimal new impervious surfaces required for the power generation facility and utility poles would not significantly inhibit the continued infiltration of rainwater into the soil for groundwater recharge. Impacts to groundwater because of the Project are minimal.

Surface Water

Road construction and final grading would take place prior to construction of the power generation facility. Surface runoff would be collected in the site drainage system consisting of stormwater drainage channels and conveyance piping to a site outfall. The site outfall would remove stormwater from the Project site and transport it to existing drainage channels along Peru Drive. Figure 4 shows the drainage plan for the Project. Until the Project site is stabilized, grading and soil disturbance could temporarily increase erosion and sedimentation into the site drainage system. Soil erosion and sedimentation impacts will be minimized using BMPs and mitigation measures. There are no jurisdictional water resources present within the Project site and the nearest TNW is the Truckee River, located approximately one mile downstream; therefore, no impacts on jurisdictional waters are expected. An upland swale and a riverine-upper ephemeral stream were identified within the Project site. Due to the characteristics of ephemeral stream and upland swales occurring only in direct response to precipitation events and in conjunction with the drainage plan prepared for the Project, impacts to surface water as a result of the Project are minimal.

3.3.3 Mitigation and Resource Protection Measures

Water erosion and dust-control measures will be incorporated during construction to mitigate potential impacts to surface water. A Nevada Construction Stormwater Permit will be required by NDEP and includes the development of a SWPPP to manage the discharge of pollutants from construction activities and thereby protecting water quality by minimizing sediment and debris from entering waterways. Key components of the SWPPP include identification of potential pollutants from the site, documentation of any spills and leaks and a plan for preventing and responding to spills. Site-specific BMPs will be implemented by the contractor

in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control will be implemented:

- All site BMPs such as silt fencing, construction access controls, concrete washout devices, fuel secondary containment structures and other required measures will be in place during construction.
- The weather will be monitored using National Weather Service reports during construction to track conditions and alert crews to the onset of significant rainfall events.
- Non-active areas will be stabilized and revegetated as soon as feasible on those portions of the Project site where construction has temporarily or permanently ceased.
- Covers will be placed over stockpiles prior to forecasted storm events and during windy conditions as necessary to prevent erosion of stockpiles. Sediment controls will be placed (such as fiber rolls, straw bales, silt fencing) around the perimeter of stockpiled materials to control sediment runoff.
- Controls will be repaired and reapplied according to BMPs in areas where erosion is evident.

Due to the lack of surface water present within the Project site, the application of stormwater BMPs, and implementation of permit conditions requiring mitigation plans, the impact on water quality will be minimized.

3.4 Air Quality

3.4.1 Existing Setting

Regulatory

The Clean Air Act (CAA) (42 U.S.C. § 7401 et seq.) as amended, regulates air emissions from stationary and mobile sources. The U.S. EPA establishes National Ambient Air Quality Standards (NAAQS) under 40 CFR Part 50 for six criteria air pollutants: sulfur dioxide (SO_2), CO, nitrogen dioxide (NO_2), particulate matter (PM), as $PM_{2.5}$ (particles less than 2.5 microns) and PM_{10} (particles less than 10 microns), ozone (O_3), and lead (Pb). With approval from the EPA, states define regulatory areas, commonly referred to as air basins, within which air quality is monitored for compliance with NAAQS. An air basin is designated as either attainment, meaning it meets the NAAQS, or nonattainment, meaning it does not meet the NAAQS. Areas for which sufficient data is not available to determine compliance with NAAQS are designated as unclassifiable and treated as attainment areas for regulatory purposes. In Nevada, air basins are analogous to hydrographic basins.

Nevada administers the CAA through the Nevada Administrative Codes (NAC) 445B. NDEP BAPC issues air permits and implements federal Prevention of Significant Deterioration (PSD)

requirements. The State of Nevada has its own statutory air quality standards, the Nevada State Ambient Air Quality Standards, which are aligned with federal NAAQS.

The NDEP BAPC classifies facilities with the potential to emit more than 100 tons per year (tpy) of any regulated air pollutant as Class I sources, which require a Title V Operating Permit from NDEP under NAC 445B.287. In areas classified as attainment or unclassifiable, the federal PSD program requires any new major source to obtain a PSD permit to prevent deterioration of air quality. A PSD "major source" is defined as any facility having potential emissions greater than 250 tpy (or 100 tpy for listed source categories).

Under CAA Section 107(d) and NAC 445B, once a minor source baseline date has been triggered within a hydrographic area, all new air permit applications in that area, including those for PSD minor sources, must include a PSD increment analysis. A PSD increment analysis uses EPA-approved dispersion modeling to estimate a Project's increase in ambient concentrations of baseline pollutants (i.e., NO_2 and PM_{10}) within the baseline trigger area and any potentially affected neighboring baseline trigger areas. The modeled concentration increase is added to the existing increment consumption (i.e., the amount of allowable deterioration already used by previously permitted sources) and compared to the applicable increment limits established in 40 CFR § 52.21(c). These limits represent the maximum allowable increase above baseline concentrations established to ensure that air quality in attainment or unclassifiable areas does not significantly deteriorate. This analysis confirms whether the Project's emissions, when combined with existing increment consumption, remain within these allowable limits.

Existing Air Quality

The Project site is within the TRI Center area and lies along USA Parkway/Nevada State Route 439 (USA Parkway) in Storey County. The Project site is on flat to rolling terrain at approximately 4,700 feet asml, with elevations ranging from approximately 4,670 feet amsl to 4,715 feet amsl. The semi-arid climate of Storey County is characterized by hot, dry summers and cool, dry winters with minimal precipitation that average 5.9 inches annually according to the nearest weather recording station located in Fernley, Nevada (Western Regional Climate Center 2025). Average temperatures for the area range from 93 degrees Fahrenheit (°F) in July to 19 °F in January and December (Western Regional Climate Center 2025).

The Project site is located within the Tracey Segment Hydrographic Area (HA-83), which is designated attainment/unclassifiable for all criteria pollutants (BlueScape 2026; EPA 2025). The area is classified as PSD Class II, which means it is subject to the standard PSD increment limits for attainment areas. Class II areas allow for a moderate amount of air quality deterioration. The Tracy Segment HA-83 is a PSD minor source baseline trigger area for NO_x and PM_{10} as of March 22, 1994, with Sierra Pacific Power's submittal of a complete PSD permit application for Tracy Generating Station.

3.4.2 Environmental Consequences

Construction Emissions

Construction-related emissions would be temporary and include fugitive dust and diesel exhaust from construction equipment. BMPs including watering exposed surfaces, limiting vehicle speeds, and maintaining equipment, would be implemented to minimize emissions. Because construction emissions are temporary and controlled through BMP implementation, impacts would be short-term and minor.

Operation Emissions

The Project consists of the following stationary combustion sources:

- Up to 136 Jenbacher J420 natural gas-fired reciprocating engines
- 12 Volvo Penta Tier 4 TWD1683GE diesel black start engines (emergency use)

Each Jenbacher engine would be equipped with a SCR system designed to substantially reduce emissions of NO_x, CO, and VOCs.

During operation, the Project would incorporate permanent emission control technologies, including SCR systems on natural gas engines, use of Tier 4–certified diesel engines, limited annual operating hours for emergency equipment, and routine maintenance and monitoring to ensure continued control efficiency. The diesel-fired equipment would operate only on an emergency and limited-use basis. Diesel engines are limited to a maximum of 100 hours per year for testing and emergency demand response. For mass emissions calculation and dispersion modeling purposes, these units were conservatively evaluated at maximum load to assess short-term impacts, and annual impacts were adjusted to reflect their limited operational hours. All diesel-powered engines would meet applicable EPA Tier 4 emission standards and operate on ultra-low sulfur diesel fuel.

The CNG pressure reducing system (PRS) units were also evaluated in the air dispersion modeling. Up to six units may operate simultaneously under worst-case conditions and were conservatively modeled at maximum hourly emission rates. PRS emissions consist only of NO_x (modeled as NO_2) and were represented as an area source. Modeling results indicate that PRS emissions are minimal and do not contribute to exceedances of applicable air quality standards. Table 4 shows the anticipated emissions from the Project during operation.

Table 4 Anticipated Operations Emissions from the Project

Pollutant	Jenbacher J420 engine emissions (tons/year)	Black start generator set emissions (tons/year)	CNG Vaporizer emissions (tons/year	Project total emissions (tons/year)
NOx	133.69	0.36	0.23	134.05
CO	138.43	0.06	0.00	138.49
$PM_{10/2.5}$	26.62	0.01	0.00	26.63

Pollutant	Jenbacher J420 engine emissions (tons/year)	Black start generator set emissions (tons/year)	CNG Vaporizer emissions (tons/year	Project total emissions (tons/year)
VOC	53.24	0.01	0.00	53.25
SO_2	39.93	0.01	0.00	39.94
CO_2	337,944.61	931.65	1,071	338,876.26

Source: (BlueScape 2026)

As the Project Potential to Emit (PTE) is not greater than 250 tpy for any criteria air pollutant and is not a listed categorial source under the federal PSD program, it is therefore classified as a PSD minor source. Because the Project PTE for at least one criteria air pollutant is greater than 100 tpy, the Project requires a Class I air permit from the BAPC. Also, because the Project is located in and adjacent to minor source baseline trigger areas, air dispersion modeling and increment tracking analysis are required as part of the Class I air permit application.

Air dispersion modeling was conducted using EPA approved AERMOD (version 24142) in accordance with 40 CFR part 51, Appendix W, NDEP General Air Dispersion Modeling Guidelines, and NDEP Class I Operating Permit Guidance. Modeling evaluated $PM_{2.5}$, PM_{10}, NO_2, SO_2, CO, and O_3. The dispersion and PSD increment analyses evaluate emissions from the proposed gas-fired power generation equipment together with emissions from combustion sources associated with the adjacent data center facility, comprising backup generators, fire pump engines, and backup engines for the substation. Because these sources would be co-located and constructed as part of the overall Peru Ridge Technology Center project development, the dispersion modeling evaluates their combined emissions to account for the cumulative contribution of both the gas-fired power-generation equipment and the associated data center combustion sources to ambient pollutant concentrations. The results of the dispersion modeling are presented in Table 5 and show pollutant emissions from the Project would not cause or contribute to exceed of the NAAQS.

Table 5 Estimated Annual Operational Emissions

Pollutant	Averaging Period	Project Modeled Concentration (micrograms per cubic meter [µg/m³])	Total Concentration (including background) (µg/m³)	NAAQS (µg/m³)	Exceeds?
$PM_{2.5}$	24-hour	15.6	23.6	35	No
	Annual	2.18	4.48	12	No
PM_{10}	24-hour	25.2	35.4	150	No
	Annual	2.18	2.18	50	No

Pollutant	Averaging Period	Project Modeled Concentration (micrograms per cubic meter [µg/m³])	Total Concentration (including background) (µg/m³)	NAAQS (µg/m³)	Exceeds?
NO_2	1-hour	182	182	188	No
	Annual	11.8	11.8	100	No
SO_2	1-hour	116	116	196	No
CO	8-hour	286	286	10,500	No

Source: (BlueScape 2026)

Ozone (O_3) was evaluated separately from the AERMOD dispersion analysis because ozone is a secondary pollutant formed through atmospheric photochemical reactions of NO_x and VOCs. Consistent with NDEP guidance, ozone impacts were assessed using the EPA's VOC/NO_x Point Source Screening Tables (Scheffe Method). The maximum predicted ozone contribution from Project emissions is 0.009 parts per million, which is below the applicable 1-hour ozone standard of 0.070 parts per million. Therefore, the Project complies with applicable ozone standards (BlueScape 2026).

An increment analysis was run to calculate the increase in ambient concentrations of the pollutants of concern (i.e., NO_2 and PM_{10}) above the PSD minor source baseline concentration (i.e., the increment) that would result from the operation of the Project at each receptor in the established grid. Receptor grids were provided by NDEP and consisted of receptors spaced 500 meters apart within both HA-083 (the location of the Project). The analysis utilized EPA-approved AERMOD dispersion modeling to quantify the Project's maximum offsite incremental concentration increases and compare them to the applicable Class II PSD increment thresholds. The applicable Class II PSD increment limits are:

- Annual NO_2: 25 µg/m³
- Annual PM_{10}: 17 µg/m³
- 24-hour PM_{10}: 30 µg/m³

Modeled concentrations were added to existing increment consumption values for each receptor to determine compliance with the increment limits established under 40 CFR § 52.21(c). Results are summarized in Table 6.

Table 6 Maximum Modeled PSD Increment Impacts

Pollutant	Averaging period	Maximum Modeled Increment (µg/m³)	PSD Class II Increment Threshold (µg/m³)	Exceeds Threshold?	Notes
NO_2	Annual	19.8	25	No	Well below increment limit

PM_{10}	Annual	9.95	17	No	Well below increment limit
PM_{10}	24-hour	36.7	30	No*	Existing baseline consumption exceeds limit at certain receptors; Project contribution does not exceed SIL

[a] The modeling report concludes that any exceedances of the 24-hour PM_{10} increment limit are attributable to pre-existing baseline increment consumption rather than the Project's emissions. The Project's modeled contribution does not exceed applicable Significant Impact Levels (SILs) and is considered negligible (SVTC Air Dispersion Modeling doc).

Source: (BlueScape 2026)

The increment tracking analysis demonstrates that the Project's incremental emissions increases, when added to existing increment consumption within HA-83, remain below the applicable Class II PSD increment thresholds for annual NO_2 and annual PM_{10}. Where the analysis shows an exceedance of the increment limit for PM_{10}, the existing 24-hour PM_{10} increment consumption is already exceeded at those receptors. However, the Project's maximum modeled increment of 0.085 $\mu g/m^3$ for PM_{10} falls below the PSD SIL of 5 $\mu g/m^3$ (BlueScape 2026). The Project therefore would not cause or significantly contribute to exceedance of the increment limit or deterioration of air quality.

Dispersion modeling conducted in accordance with EPA and NDEP requirements demonstrates compliance with all applicable NAAQS. The PSD increment tracking analysis confirms that modeled increases in annual NO_2 and annual PM_{10} concentrations would not cause of significantly contribute to exceedance of the applicable Class II increment limits. Although existing 24-hour PM_{10} increment consumption exceeds the allowable threshold at certain receptors, the Project's modeled contribution does not exceed applicable SIL and therefore does not significantly contribute to those exceedances. Ozone impacts were evaluated using EPA's Scheffe screening method and were determined to be well below applicable standards. With incorporation of the identified mitigation measures, required permits, and enforceable operational controls, the Project would not cause or contribute to a violation of ambient air quality standards or PSD increment limits, and operational air quality impacts would be less than significant.

3.4.3 Mitigation Measures

Wind erosion and dust-control measures will be incorporated by construction crews to minimize potential impacts to air quality. A SAD permit would be required by the NDEP BAPC to control dust and prevent particulate matter from becoming airborne, since the Project requires more than 5 acres of disturbance. Site-specific BMPs will be implemented in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control will be implemented:

- Vegetation removal and grading will be minimized to the extent practicable.
- Water or dust palliatives will be applied to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction as required by

the NDEP BAPC SAD permit. Water will be applied using water trucks. Water application rates will be minimized as necessary to prevent runoff and ponding.
- During windy conditions, including forecast or actual wind conditions of approximately 25 miles per hour or greater, dust control will be applied to haul roads to adequately control wind erosion. Exposed stockpiled material areas will be covered.
- Excavation and grading will be temporarily suspended during periods of high winds when dust cannot be reasonably controlled.
- All trucks hauling soil and other loose materials will be covered or at least 2 feet of freeboard will be maintained.

Due to the nominal amount of emissions anticipated because of Project construction and maintenance activities, wind erosion BMPs, dust-control measures, and required permits, the impact on air quality will be minimized.

3.5 Biological Resources

3.5.1 Overview

This biological resources section describes the vegetation communities, plants, and wildlife species present, or potentially present, within the Project site and the potential impacts on these resources resulting from the Project's construction and operation. Special status plant and wildlife species with potential to occur in the Project site are evaluated in this section. For the purposes of this ES, special status species are those that have designated conservation status(es) under the Endangered Species Act (ESA) (as administered by USFWS) and/or NAC.501 and NAC.503 (administered by the Nevada Department of Wildlife [NDOW]) or are designated by NDOW as priority species. The Nevada Division of Natural Heritage (NDNH) identifies species whose populations are in decline and classifies them as vulnerable, imperiled, or endangered and makes recommendations to NDOW regarding their need to be placed on the list of Nevada protected species. These NDNH species are evaluated in this ES as special status species, but permits for take of these species are not required. Other groups of protected species include migratory birds and eagles protected by the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act (BGEPA). This ES also addresses potential for impacts to sensitive habitats. Sensitive habitats are either (1) recognized by the NDNH or USFWS as being locally depleted, (2) considered regionally rare by experts, (3) known to support special status species, or (4) known to serve as important wildlife corridors.

A biological resources assessment was previously prepared by UES for the Peru Shelf project, which is located within and directly south of the Project site (UES 2024a). The study area evaluated for the Peru Shelf project fully encompasses the proposed location of the Project's power generation facility (Figure 6**Error! Reference source not found.**). Because the assessed area completely overlaps the proposed facility site, the Peru Shelf biological resources assessment can be used to inform the evaluation of biological resources for the Project.

Figure 6 **Area of Overlap Between the Peru Ridge Gas Power Generation Facility and Peru Shelf Project Site**



The Peru Shelf biological resources assessment included data queries from the USFWS, NDOW, NDNH, and other publicly available data sources for understanding habitat, waters, and species in the area. As part of that assessment, a UES botanist visited the site on July 17, 2024, to verify vegetation communities and evaluate potential for special status plant species to occur in the area using the intuitive controlled survey method. This method involves identifying habitats with the potential to support special status plants and surveying the area for their presence. This survey was performed during the blooming period for special status plants, when diagnostic characteristics are most visible, thereby maximizing the likelihood of detection of such species (UES 2024a).

A site visit to the Project site was performed by a Panorama biologist on January 22, 2026. During the visit, the biologist spot-checked the habitats onsite to confirm the vegetation communities and habitat conditions were consistent with those documented during an October 15, 2025 site visit to adjacent areas conducted for a separate project by the same biologist.

The following sources of information were used to evaluate biological resources within the Peru Ridge Gas Generation Project site:

- **Peru Shelf Biological Resources Assessment (UES 2024a)**: provided biological resources information for the overlapping Peru Shelf Project
- **USFWS Information for Planning and Consultation (IPaC) data obtained on February 19, 2026 (USFWS 2026):** provided an updated list of federal listed, proposed, and candidate species with potential to occur in the Project site
- **Panorama site visit on October 15, 2025 to an adjacent area within the overall data center development area:** provided information on biological resources with potential to occur within the Project site as similar habitat conditions are present in both areas
- **Panorama site visit on January 22, 2026:** provided ground-truthed information on the vegetation communities, habitat, and species present onsite

3.5.2 Existing Setting

Existing Site Conditions

This section describes the vegetation communities, plants, and wildlife species present, or potentially present, within the 23.4-acre Project site. Approximately 4.1 acres of the Project site have been previously graded for roads and other facilities under a grading permit issued for the overall data center development. These graded areas no longer support vegetation and provide little to no habitat value for plant or wildlife species. The remaining 19.3 acres of the Project site maintain the natural vegetation and topography of the area. The topography in these areas is characterized by gentle slopes. An ephemeral drainage is present within the Project site; however, no surface water was observed during the January 2026 site visit. Additionally, the ephemeral stream has been re-directed on the north side of the existing access road to a new stormwater channel.

Because the graded portions of the Project site no longer contain habitat for plant or wildlife species, the remainder of this section discusses the existing conditions and potential impacts within the 19.3 acres of undeveloped habitat.

Vegetation Communities

The vegetation community within the Project site is best characterized as LANDFIRE's (U.S. Department of Agriculture 2025) Intermountain Basins Semi-Desert Shrub Step community type, which corresponds to the NDOW Key Habitat Intermountain Cold Desert Shrub. This vegetation community is common within the Northern Nevada's Basin and Range topographic area. Within the Project site, this community type was dominated by broom snakeweed (*Gutierrezia sarothrae*), a woody subshrub species. The other species characteristic of the shrub layer but only occurring in low densities throughout the Project site was an ephedra species (*Ephedra nevadensis* or *Ephedra viridis*), big sagebrush (*Artemisia* spp.), and rabbitbrush (*Chrysothamnus* spp. or *Ericameria* spp.). The herbaceous layer within the site was characterized predominantly by the invasive annual grass, cheatgrass (*Bromus tectorum*), and an unidentified, but common, spreading ground cover plant. Although cheatgrass was present throughout the area, no large or dense infestations were observed.

No sensitive habitats were observed within the Project site.

Special Status Plants

The USFWS IPaC query for the Project site did not identify any special status plants with potential to occur (USFWS 2026), consistent with the NDNH data reviewed for the Peru Shelf Project site (UES 2024a). No other special status plants are likely to occur within the Project site due to the absence of suitable habitat and/or because the Project site lies outside the known range of the species. UES identified two special status plant species, Lemmon's buckwheat (*Eriogonum lemmonii*) and Nevada suncup (*Eremothera nevadensis*), as having a "Possible" potential to occur within the broader Peru shelf Project site, (see Table 4 in the Peru Shelf Biological Resources Assessment [UES 2024]). However, suitable habitat for these species is not present within the Project site. Additionally, no special status plant species were observed during the July 2024 botanical survey of the Peru Shelf area (UES 2024a). Based on the lack of suitable habitat and prior survey results, no special status plant species are expected to occur within the Project site.

Habitat within the Project site consists of an early-seral plant community dominated by a mix of native and invasive species. Several factors indicate that special status plant species are unlikely to occur within the Project site: (1) no special status plant occurrences have been documented in the vicinity by the NDNH or USFWS (USFWS 2026; UES 2024a); (2) no special status plants were observed during botanical surveys of the adjacent and overlapping Peru Shelf Project site, which supports the same habitat types (UES 2024); and (3) suitable habitat is absent for the two special status plants determined to have a "Possible" potential to occur in the broader area, Lemmon buckwheat and Nevada suncup, (UES 2024a). Based on the degraded, early seral habitat conditions and the absence of documented occurrences or suitable habitat, no special status plant species are expected to occur within the Project site.

Cacti and Yucca

Cacti and yucca species are not special status plants in the same sense as those listed by the State of Nevada or the USFWS. However, all cacti and yucca are protected by the State of Nevada, and a permit is required if any are to be harmed or removed on public land. Removal is allowed on private land with the written permission of the landowner (NRS 527.100). Prickly pear cactus (*Opuntia* sp.) individuals were observed by the Panorama biologist in October 2025 within similar habitat in another portion of the overall data center development area, near the Project site. Based on the presence of suitable habitat and documented occurrences nearby, this species, and potentially other cactus species, are likely to occur within the Project site.

General Wildlife

General wildlife species that are known to occur in Intermountain Cold Desert Shrub habitat and within the vicinity of the Project site include cottontail (*Sylvilagus* sp.), coyote (*Canis latrans*), chipmunk (*Neotamias* sp.), wild horse (*Equus caballus*), pronghorn antelope (*Antilocapra americana*), mule deer (*Odocoileus hemionus*), Great Basin collared lizard (*Crotaphytus bicinctores*), western fence lizard (*Sceloporus occidentalis*), long-nosed leopard lizard (*Gambelia wislizenii*), various common bird and raptor species, such as common raven (*Cornus corax*), rock wren (*Salpinctes absoletus*), and red-tailed hawk (*Buteo jamaicensis*), and other common small mammal and reptile species. Many of these species were confirmed to be present either by their sign (scat, tracks, burrows, etc.) or by direct observation during the UES site visit in July 2024 (UES 2024a) in the overlapping Peru Shelf Project site.

The Intermountain Cold Desert Shrub habitat within the Project site provides suitable habitat for the general wildlife species listed above. Many of these species are tolerant of anthropogenic disturbance and could be expected to occur despite ongoing or adjacent construction activities. Most of the species listed above were confirmed present within the overlapping Peru Shelf Project site (UES 2024a) and, given the shared habitat characteristics, are also expected to occur within the Project site. During the site visit to the Project site on January 22, 2026, no wildlife species or their sign were observed. However, during the site visit to the adjacent data center development area on October 15, 2025, general wildlife species and their sign were documented. Given the proximity of that area to the Project site and the presence of similar habitat conditions, these species are expected to occur within the Project site. Observations from the October 2025 visit included several songbirds (with shrubs on the site providing potential nesting habitat), wild horse scat and individuals, small burrow holes suggestive of small mammal (mouse or rat-sized) species, and leg bones from a larger mammal species.

Migratory Birds, Including Raptors

Migratory birds are likely to occur within the Project site during the breeding season (March 1 through August 31). Several songbirds were observed during the October 15, 2025, site visit to the adjacent data center development area, indicating the habitat is suitable for migratory bird breeding and foraging. Shrubs present within the Project site, particularly the ephedra, may provide nesting substrate. The existing vegetation also offers foraging opportunities, either directly or by providing habitat for insect prey species.

Raptor species, including eagles, could use the habitat within Project site for foraging. The vegetation present could provide shelter and foraging opportunities for small mammals, reptiles, and birds, which serve as prey species for raptors. Although no raptors were observed during the January 22, 2026 site visit, or the October 15, 2025 site visit to the adjacent data center area, the nearby NV Energy transmission lines to the west could provide suitable perching substrate. No suitable nesting habitat for raptors is found within the Project site, and the nearby NV Energy transmission towers, due to their wood monopole configuration, are unlikely to provide nesting substrate raptors could, however, nest in the surrounding mountains and travel from those locations to forage within the site.

Special Status Wildlife

Special status wildlife species were considered to have potential to occur in the Project site if their known geographic and elevational ranges overlap the Project site and suitable habitat is present in the Project site or in the immediate vicinity. Special status wildlife species with potential to occur in the Project site are expected to align with those identified as potentially occurring in the Peru Shelf Project site (UES 2024a) because of the shared habitat. The IPaC query for the Project site identified three federal special status species as potentially occurring (USFWS 2026): northwestern pond turtle (*Actinemys marmorata;* proposed Threatened); cui-ui (*Chasmistes cujus;* Endangered); and monarch butterfly (*Danaus plexippus Plexippus;* proposed Threatened). These species are the same as those identified in the Peru Shelf biological resources assessment (UES 2024a). No suitable aquatic habitat for northwestern pond turtle or cui-ui occurs within the Project site. Cui-ui is endemic to Pyramid Lake in northern Nevada and there is no potential for either aquatic species to occur on site.

Monarch butterfly relies on milkweed plants (*Asclepias* sp.) for breeding. Milkweed plants were observed within ephemeral washes in the Peru Shelf Project site in July 2024 (UES 2024). An ephemeral wash is present along the southeast boundary of the Project site; if milkweed occurs within this feature, monarch butterflies could potentially breed there. Monarchs breeding in nearby washes could also enter the Project site while foraging.

In addition to the three federally listed species identified by IPaC, other special status wildlife species identified by UES as having potential to occur within the Peru Shelf Project site were evaluated for the Project site (refer to Table 7). Based on habitat conditions and species ranges, a total of six special status wildlife species have potential to occur in the Project site.

The greater sage-grouse (*Centrocercus urophasianus*), including Bi-State Distinct Population Segment (DPS), is a Nevada-protected game bird. It is a sagebrush obligate species that uses a variety of sagebrush habitats and is often near meadows. No suitable habitat and no active leks occur within the Project site. The nearest Greater Sage-Grouse Habitat Management Area is approximately 3 miles away, separated by the physical barrier of Interstate 80.

Table 7 Special Status Species with Potential to Occur in the Project Site

Species	Status[a]	Habitat	Potential to Occur in the Project Site
Birds			
Golden Eagle *Aquila chrysaetos*	BGEPA	Occurs in a wide range of habitats throughout Nevada, where it primarily nests on cliff ledges and sometimes large trees.	**Nesting – None, Foraging – Possible.** There is no suitable nesting habitat, but there is suitable foraging habitat and individuals may be present while hunting. Existing transmission structures adjacent the Project site provide perching opportunities.
Greater sage-grouse (Including Bi-State DPS) *Centrocercus urophasianus*	N-P Game Bird	Sagebrush obligate species that uses a variety of sagebrush habitats and is often in close proximity to meadows.	**Nesting – None. Foraging – None.** No managed leks are present in the Project site or its vicinity and there is no suitable sagebrush habitat within the Project site.
Peregrine falcon *Falco peregrinus*	N-E	Occurs in open environments, usually in proximity to suitable cliff nesting habitat.	**Nesting – None. Foraging – Possible.** There is no suitable nesting habitat, but there is suitable foraging habitat and individuals may be present while hunting. Existing transmission structures adjacent the Project site provide perching opportunities.
Invertebrates			
Monarch butterfly *Danus plexippus plexippus*	F-PT	Occurs throughout Nevada, which is part of the species' spring and summer range. Dependent on milkweed or dogbane (*Apocynaceae*) as host plants for breeding. Forages on these and other flowering plants.	**Possible.** Milkweed plants were found within ephemeral drainages in the adjacent/overlapping Peru Ridge Project site; individuals breeding on these plants could fly through the Project site while foraging. There is one ephemeral drainage that runs along the southeast side of the Project and monarch butterfly could breed there if milkweed plants are present.
Mammals			
Bighorn sheep *Ovis canadensis*	N-PS	Occupies meadows, mountain slopes, and foothills. Requires rocky slopes for escape habitat from predators.	**Unlikely.** Suitable habitat is present west of the Project site, but there are no water features that would draw sheep to the Project site.
Mule deer *Odocoileus hemionus*	N-P Big Game Species; N-PS	Widespread in Nevada; associated with sagebrush steppe, aspen, and mountain shrub communities.	**Possible.** Suitable habitat is present, observations have been made in the vicinity of the Project site, and this species is tolerant to human disturbance
Pronghorn antelope *Antilocapra americana*	N-P	Occurs throughout mountainous areas of northern and central Nevada, where it is found primarily in open terrain.	**Possible.** Suitable habitat is present and observations within 10 miles have been made.

Notes:

[b] Conservation Status codes: BGEPA = Bald and Golden Eagle Protection Act; N-E = Nevada Endangered; N-P = Nevada Protected; N-PS = Nevada Priority Species; F-PT = Federal Proposed Threatened

3.5.3 Environmental Consequences

Vegetation

The 23.4-acre Project site includes approximately 4.1 acres that have been previously graded under a permit for the overall datacenter development (refer to Table 2 for a breakdown of temporary and permanent disturbance acreages). These graded areas have been compacted and lack vegetation and viable seed bank; therefore, they do not provide vegetation value and there would be no impacts to vegetation. The remaining approximately 19.3 acres support Intermountain Cold Desert Shrub habitat. Permanent impacts to vegetation would occur from construction of permanent Project infrastructure. Permanent impacts would result in the removal of vegetation and conversion to structures or compacted surfaces, precluding regrowth until decommissioning and reclamation. Given the widespread distribution and common occurrence of this habitat type in the surrounding area, and the absence of sensitive vegetation communities on site, the permanent loss of relatively small acreage (4.1 acres) would represent a minor impact.

Temporary impacts would occur within construction work areas and staging areas used for Project activities. Vegetation within temporarily disturbed areas would be expected to recover at varying rates depending on disturbance intensity and restoration methods (e.g., reseeding). Areas subject to light disturbance (e.g. drive and crush impacts associated with limited short-term overland travel) would be expected to recover at faster rates than heavily compacted areas. Temporary impacts would be minimized through implementation of the measures described in Section 3.5.4, including confining activities to clearly delineated work areas; restricting vehicles, equipment, and pedestrians to prove roadways and work areas; limiting overland travel; providing Worker Environmental Awareness Program (WEAP) training to personnel; restoring temporary work areas following construction (including grading, soil stabilization, soil the compaction, and revegetation in accordance with the Project's SWPPP); maintaining erosion and sediment control measures until revegetation success criteria are achieved; implementing dust control measures; and implying invasive species prevention and control BMPs. With implementation of these measures, temporary impacts to vegetation diversity, structure, and ecosystem function would be short term and minor.

Construction and operation activities could result in indirect impacts to vegetation. Fugitive dust generated during construction could settle on vegetation and temporarily reduce photosynthetic efficiency. Runoff from disturbed areas could contribute to soil erosion and degrade plant habitat. The presence of personnel, equipment, and vehicles could increase wildfire risk. During operations, vegetation maintenance activities, such as herbicide application, could affect nontarget vegetation if not properly implemented. Invasive species could also be introduced or spread via vehicles, equipment, or personnel.

As described in Section 3.5.4, the Project would implement dust control measures; maintain erosion and sediment control BMPs until successful revegetation; prohibit campfires and restrict smoking to designated areas; apply herbicides in accordance with State and county regulations and label requirements, and only under appropriate weather conditions; and implement invasive species prevention and control measures, including equipment cleaning and prompt treatment of infestations. With implementation of these measures indirect impacts to vegetation would not be adverse.

Special Status Plants

No special status plants are expected to occur in the Project site. Therefore, Project construction and O&M would have no impacts on special status plants.

Wildlife, Including Migratory Birds, Raptors, and Special Status Species

Construction would disturb up to 23.4 acres, of which approximately 4.1 acres are already graded and provide little wildlife habitat value; however, undeveloped areas support Intermountain Cold Desert Shrub habitat that is common and widespread in the region. Permanent habitat loss would be limited to areas occupied by Project infrastructure. Given the small area affected and the common and regionally abundant nature of the present habitat, permanent habitat loss would be minor.

Temporary habitat disturbance would occur during construction but would become restored following completion of work. Recovery rates would depend on disturbance type and restoration success as described for vegetation. With implementation of avoidance, minimization, and restoration measures (Section 3.5.4), temporary habitat impacts would be minor.

Construction activities could also result in indirect habitat degradation from dust, runoff, wildfire risk, and the introduction or spread of invasive species. As described in Section 3.5.4, dust suppression, erosion and sediment control, fire prevention measures, and invasive species BMPs will be implemented to reduce these risks. With implementation of these measures, indirect impacts to wildlife habitat would not be adverse.

Construction could directly affect individual wildlife through ground disturbance, vegetation clearing, vehicle traffic, noise, and vibration. Potential effects include injury or mortality, destruction of active migratory bird nests, wildlife-vehicle collisions, temporary displacement, and disturbance-related stress. Wildlife could also become entrapped in open trenches, pipes, or stockpiled soils, and construction activities could attract predators through improper waste management.

To reduce these impacts, the Project would implement the wildlife protection measures described in section 3.5.4. These include, but are not limited to: WEAP training for personnel; restricting activities to designated work areas; limiting overland travel; implementing vehicle speed limits; conducting preconstruction migratory bird clearance surveys during the nesting season (March 1 through August 31) and establishing avoidance buffers as necessary; daily inspection of vehicles and equipment; covering or providing escape ramps for trenches and

holes; inspecting stockpiles prior to disturbance; properly containing and removing trash and food waste; limiting nighttime construction and minimizing lighting; and contacting a qualified biologist if special status species are observed. With implementation of these measures, construction-related impacts to wildlife, including migratory birds, raptors, and special status species, would be minor.

Operation and maintenance activities could result in wildlife disturbance from vehicles use, vegetation management, human presence, and the presence of Project structures. Potential effects include wildlife vehicle collisions, disturbance of nesting birds during vegetation management, herbicide exposure to nontarget vegetation or wildlife if improperly applied, and avian interactions with structures. As described in section 3.5.4, operation and maintenance measures include vehicle speed limits, proper waste management, invasive species BMPs, herbicide application in compliance with regulations and only under appropriate weather conditions, installation of anti-perching features as needed, and conducting pre-activity migratory bird surveys when vegetation removal occurs during the nesting season. With the implementation of these measures, impacts on wildlife from operation of the Project would not be adverse.

Migratory bird and raptor species could be affected by construction and operation in the same ways described above for general wildlife. The avoidance, minimization, and monitoring measures identified in Section 3.5.4 would apply to the species and would reduce impacts to minor levels.

Seven special status wildlife species have the potential to occur within the Project site (refer to Table 7). These species could experience the same types of impacts described above for general wildlife. Implementation of the measures described in Section 3.5.4 would minimize potential effects. With these measures in place, impacts to special status wildlife species would be minor.

3.5.4 Mitigation and Other Resource Protection Measures

Vegetation and Wildlife Habitat

Construction

The following measures will be implemented to reduce construction impacts on vegetation and wildlife habitat:

- Construction personnel will receive WEAP training that will instruct them on how to minimize impacts to vegetation and wildlife habitat, including staying within defined work areas and making sure boots and equipment are cleaned before entering the site so as to prevent the spread of invasive species.
- The amount of vegetation impacted by the Project will be kept to the minimum necessary for Project implementation. Work areas will be visibly marked prior to construction. Work activities will only take place within these areas.
- Equipment, vehicles, and pedestrians will be restricted to approved roadways and work areas. Overland travel will be minimized to the extent possible.

- After completion of construction, temporary work areas will be restored to pre-Project conditions, including grading and contours. Restoration will include soil stabilization, soil decompaction, and revegetation. Revegetation will be considered successful when the species diversity and percent cover is within 70 percent of pre-Project conditions as determined by a qualified biologist. An adaptive management framework will be employed wherein revegetation methods will be adjusted as needed to ensure revegetation success. Revegetation will be completed per the requirements of the Project's SWPPP.
- Temporary erosion and sediment control measures will be maintained until vegetation has been successfully restored. See the previous measure for the standards of successful revegetation.
- Dust control methods will be used during construction to prevent fugitive dust.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures will include, but will not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for weed management is deemed necessary to control weed infestations, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions so as to prevent herbicide drift.

Operation and Maintenance

The following measures will be used to reduce O&M impacts on vegetation and wildlife habitat:

- Limited ground disturbing activities or overland vehicle travel will occur during operation and maintenance. If this is required, then measures for construction identified herein will be implemented to protect biological resources.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures will include, but will not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for vegetation and weed management is deemed necessary to control infestations, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions so as to prevent herbicide drift.
- Employees, contractors, and subcontractors will be prohibited from having pets, campfires, or firearms in the Project site. Smoking will be limited to designated areas away from flammable material.

Wildlife, Including Migratory Birds, Raptors, and Special Status Species

Construction

The following measures will be used to reduce construction impacts on wildlife species, including migratory birds, raptors, and special status species:

- The WEAP training received by all construction personnel (see above) will educate them on the types of special status wildlife species with potential to occur in the site and how to identify and avoid them. Among other topics, the training will cover not harassing wildlife, preventing disturbance of nests and burrows, and what to do if a special status species is observed.
- Equipment, vehicles, and pedestrians will be restricted to approved roadways and work areas. Overland travel will be minimized to the extent possible.
- Vehicle and equipment operators will adhere to a 25 mile-per-hour speed limit or less, as determined appropriate by the site environmental health and safety manager, while onsite to avoid collisions with wildlife.
- At the beginning of each workday, construction personnel will check for wildlife beneath vehicles and equipment prior to moving or operating them. Any spaces within vehicles or equipment that an animal could get into will also be checked.
- Trash and waste, including food waste, will be properly contained and removed from the site to prevent food subsidies for predators.
- Construction activities will only occur during daylight hours (half hour after sunrise to half hour before sunset) to avoid the use of construction lighting during night and crepuscular periods. If an activity must occur outside of daylight hours, then the minimal amount of lighting necessary for safety will be used and vehicle speeds will be lowered to a maximum of 15 miles per hour to minimize potential for wildlife impacts.
- Noise from heavy equipment will be temporary during the construction of the Project. Once the facilities are in operation, noise will be minimal. If a nest or burrow is found that is occupied by a special status or otherwise protected species, including migratory birds, then the qualified biologist will determine an appropriate avoidance buffer size that prevents noise disturbance. If noise disturbance cannot be avoided, then the qualified biologist will contact the USFWS and/or NDOW as appropriate to determine next steps.
- At the end of each workday, any open trenches, holes, or pipes will be covered to prevent wildlife entering them and becoming entrapped. Alternatively, escape ramps can be inserted into these features to allow wildlife to escape. If any of these features are discovered to not be in compliance with these measures at the beginning of a workday, it will be checked thoroughly for the presence of wildlife prior to the commencement of construction activities.
- Stockpiled soil will be inspected for wildlife prior to moving or disturbing the stockpile if the stockpile has been undisturbed for more than 24 hours or has been left undisturbed overnight. If wildlife are found in the stockpile, they will be allowed or encouraged to leave unharmed before the stockpile is disturbed.

- If construction activities commence during migratory bird nesting season (March 1 through August 31) or if work is halted for more than a week in an area, then a qualified biologist will conduct a preconstruction clearance survey to determine the presence of nests within the construction area. If active nests are found, the biologist will determine the appropriate methods needed to avoid disturbing the nest, including but not limited to establishing avoidance buffers. A biological monitor will monitor the nest progression until the young have fledged, at which point construction may continue within the nest avoidance buffer.
- If a previously undetected nest is observed in the work area during construction and could be impacted by Project activities, the construction contractor will cease work and contact the qualified biologist to determine the appropriate methods needed to avoid disturbing the nest. If the nest is active, a biological monitor will monitor the nest progression until the young have fledged, at which point construction may continue within the nest avoidance buffer. If the nest is inactive, a qualified biologist will oversee the removal of the nest.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures will include, but will not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for vegetation and weed management is deemed necessary, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions so as to prevent herbicide drift.
- Employees, contractors, and subcontractors will be prohibited from having pets, campfires, or firearms in the Project site. Smoking will be limited to designated areas away from flammable material.
- If a non-special status wildlife species is found onsite, work that could injure the animal will not commence until it leaves the area, either on its own or through encouragement.
- If a special status wildlife species is found onsite, a qualified biologist will be contacted immediately and any active construction in the vicinity of the animal will cease. The animal will be allowed to leave the area passively. If the animal does not leave, then the qualified biologist will contact USFWS and/or NDOW as appropriate to determine next steps.

Operation and Maintenance

The following measures will be used to reduce O&M impacts on wildlife:

- Limited ground disturbing activities or overland vehicle travel will occur during operation and maintenance. If this is required, then measures for construction identified herein would be implemented to protect biological resources.
- Vehicle and equipment operators will adhere to a 25-mile-per-hour speed limit while onsite in order to avoid collisions with wildlife.

- Trash and waste, including food waste, will be properly contained and removed from the site so as to prevent food subsidies for predators.
- Anti-perching features will be installed on Project structures as needed to reduce the risk of avian harm with the facility and to reduce the potential for increased predation from avian species on prey animal populations.
- BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds will be implemented. Such measures would include, but would not be limited to, cleaning of equipment and vehicles prior to entering the site and promptly addressing infestations using appropriate control methods. Mechanical methods of removing and controlling weed infestations will be preferentially used over herbicides.
- If the use of herbicides for vegetation and weed management is deemed necessary, herbicide use will comply with State and County regulations and the product's label. Herbicides will not be used in windy conditions so as to prevent herbicide drift.

3.6 Cultural Resources

3.6.1 Existing Setting

NRS Chapter 383 establishes Nevada's framework for historic preservation and establishes the Nevada State Historic Preservation Office (SHPO) to administer the State's preservation programs, maintain an inventory of cultural resources, and coordinate with federal, State, tribal, and local agencies. NRS 381 provides specific protection for historic sites and requires immediate notification to SHPO when artifacts, human remains, or burial goods are discovered during construction or other ground-disturbing activities. NAC 703.415 through 703.427 establishes the content and review requirements for UEPA applications and includes the obligation to evaluate environmental effects on cultural, archaeological, and historic resources.

There is archaeological evidence to suggest people have occupied the Great Basin for at least 13,000 years. The Project site can be found within the western Great Basin, which includes the eastern front of the Sierra Nevada range in California and most of Nevada. The western Great Basin can be further divided into three subregions: the central sub-region, the Lahontan Basin, and the Eastern Slopes of the Sierras. The Project site is located within the Lahontan Basin.

The overall region played an important role in early exploration, attracting settlers to move west to California and Oregon. The area was developed for mining, cattle ranching, and farming during the settlement of the American West after the completion of the transcontinental railroad in 1869.

3.6.2 Environmental Consequences

Construction of the Project has the potential to impact cultural resources during ground-disturbing activities. Direct impacts on cultural resources can result from damage to previously undiscovered resources during grading, vegetation removal, road construction, and installation of the power generation facility. Of the 23.4-acre Project site, approximately 4.1 acres have

already been graded under the grading permit received from Storey County and no cultural resources were encountered during those activities. Based on the prior disturbance within the Project site, additional impacts to cultural resources are not anticipated; however, the potential for undiscovered resources to be present in previously undisturbed areas cannot be entirely excluded. Other impacts, such as theft or vandalism could occur because of increased human presence, if cultural resources are discovered in the Project site. Potential effects would be minimized through implementation of cultural resource surveys, monitoring as appropriate, and the avoidance or mitigation measures for, any resources identified during construction. Potential impacts that could occur during operational activities are not anticipated, since no new ground disturbance is expected during O&M.

3.6.3 Mitigation and Resource Protection Measures

As appropriate, the following cultural resource measures will be implemented:

- The WEAP will include identification of cultural resources and the procedures to implement if suspected resources are found.
- If any cultural resource artifacts, human remains, or burial goods are inadvertently discovered during construction, work will be halted immediately within a minimum distance of 300 feet from the discovery, and a professional archaeologist will be mobilized to the site to evaluate the find. Any potential resources will not be handled or moved. The professional archaeologist will then determine whether the find needs to be evaluated by a paleontologist or Native American representative. The appropriate specialist(s) will then make a determination of the significance of the find and the steps to be followed before proceeding with the activity. SHPO and appropriate Tribes will be notified and consulted on eligibility and suitable treatment options.

Due to the implementation of mitigation measures and compliance NRS and NAC regulations, the impact on cultural resources will be minimized.

3.7 Land Use

3.7.1 Existing Setting

Land use describes the ways in which the community utilizes land, including the applicable planning policies for Storey County and TRI Center. Storey County and TRI Center regulate land use within the Project site utilizing the Storey County Zoning Ordinance Chapter 17.35, Storey County Master Plan, and TRI Center Industrial Center Development Handbook. Storey County is divided into seven planning areas. The Project site is within the McCarran Planning Area, which is approximately 85,573 acres or 50 percent of Storey County (Storey County 2024b). TRI Center has approximately 30,000 acres for developable industrial use (Tahoe-Reno Industrial Center, n.d.).

The Project site is located within the central western portion of the TRI Center. The Project site is zoned as "I-2 Heavy Industrial" under the Storey County Zoning Ordinance Chapter 17.35 (Storey County 1999) and is subject to the Storey County Master Plan (Storey County 2024b) land use designation of "Industrial" and the TRI Center Industrial Center Development Handbook, which allows for the development of electric switching stations, substations, and transmission facilities by entitlement. The Project is consistent with the Storey County Master Plan and the TRI Center Development Handbook goals and objectives.

Land use immediately adjacent to the Project site is Industrial (Storey County 2024a). The Project is surrounded by graded areas for data center development and is currently being developed.

3.7.2 Environmental Consequences

The Project would be suited with the uses described under the Heavy Industrial designation. The development of the gas generation facility is included in the Heavy Industrial zoning and would not require separate land use approval for construction by the Storey County Planning Commission or the Storey County Board of Commissioners, but grading and building permits would still be required. The Project is consistent with the Storey County Master Plan and the TRI Center Development Handbook goals and objectives. Additionally, the Project would not require the acquisition of rights-of-way or the displacement of any existing businesses or residences; therefore, no impacts to land use are anticipated.

3.7.3 Mitigation and Resource Protection Measures

The Project is consistent with the established goals, objectives, and policies of Storey County as codified in the Official Zoning Ordinance of Storey County, Nevada – Title 17, Storey County Master Plan, and the TRI Center Development Handbook. The Project would not impact current or known future land use activities in the area; therefore, no mitigation or other resource protection measures are proposed.

3.8 Transportation

3.8.1 Existing Setting

In Storey County, transportation planning is guided by the Storey County Master Plan, which outlines goals, policies, and infrastructure classifications for regional mobility, including the TRI Center. The plan identifies key corridors such as Interstate 80 (I-80) and USA Parkway, which serve as primary access routes to TRI Center. The Nevada Department of Transportation (NDOT) coordinates with local agencies to ensure compliance with federal and State regulations.

The Project site is located approximately 22 miles east of Reno, Nevada. The Project site is accessed using I-80 to USA Parkway to Denmark Drive, to Peru Drive, and then via a private access road into the Project site (refer to Figure 7). This route would be used during construction

and operation. Roadway types were identified using the NDOT Functional System Map: USA Parkway is a Principal Arterial (Other Freeways/Expressways) roadway and Denmark Drive and Peru Drive are Minor Collector roadways (NDOT, n.d.)

The Project site is generally located 2.7 miles south of the I-80 and USA Parkway interchange. All roadways used to access the Project site are paved except the private access road, which is unpaved. Average annual daily traffic (AADT) counts for I-80 and USA Parkway, from the Traffic Records Information Application (TRINA), are included in **Error! Reference source not found.** (NDOT 2024).

Table 8 Annual Average Daily Traffic Counts at Roadways Near the Project Site

Count Station Location	Station ID	Station Type	AADT Count (2024)
315 ft South of I-80 USA Parkway Interchange	0311077	Short-term	24,100
Eastbound off-ramp of the USA Parkway Interchange - Exit 33	0311073	Short-term	10,300

3.8.2 Environmental Consequences

Construction

Traffic associated with Project construction would include passenger vehicles and heavy vehicles to supply concrete, construction materials, and equipment. Construction activities are estimated to generate approximately 90 daily vehicle trips (DVT) at the I-80/USA Parkway interchange and along USA Parkway near Exit 33, north of the Project site. These trips would consist of approximately 40 passenger vehicles and 50 heavy trucks. This represents an increase of approximately 0.4 percent of existing I-80 volumes (24,000 AADT) and approximately 0.9 percent of traffic on USA Parkway near Exit 33 (10,300 AADT). While a portion of the passenger-vehicle trips may occur during the morning and evening commute periods, the resulting increase in traffic would amount to only a few additional vehicles per hour per lane during peak hours. This incremental change would remain far below thresholds that would measurably affect Highway Capacity Manual performance metrics, such as freeway density or ramp terminal control delay.

The additional heavy-truck traffic would represent approximately 0.2 to 0.4 percent of total traffic volumes, which would not materially alter heavy-vehicle proportions, operating speeds, or queuing conditions. Given the small magnitude of change relative to existing traffic volumes and roadway capacity, construction related trips would not result in a discernible change in roadway operations or Level of Service (LOS) on I-80 or USA Parkway and therefore would not constitute a significant traffic impact.

Local access roads to the Project site, including Denmark Drive and Peru Drive, serve the surrounding industrial center and are expected to accommodate construction traffic without operational constraints. Construction-related traffic effects would be temporary and minor.

Figure 7 Access Route to the Project Site from I-80



Following site grading and preparation, approximately 170 heavy duty trucks would deliver the J420 engines and associated equipment. This delivery event would occur once and would use the same route as construction traffic. The deliveries would represent an increase of approximately 0.7 percent of existing I-80 volumes (24,000 AADT) and approximately 1.7 percent of USA Parkway volumes near Exit 33 (10,300 AADT). Because this increase would be short-term and limited in duration, traffic impacts would be temporary and minor.

Operation and Maintenance

During O&M, the Project would generate approximately 20 DVT from heavy trucks delivering CNG tanks, at the I-80/USA Parkway interchange along USA Parkway near Exit 33. This traffic would represent an increase of approximately 0.1 percent of existing I-80 volumes (24,000 AADT) and 0.2 percent of USA Parkway volumes near Exit 33 (10,300 AADT).

CNG deliveries would occur over a 24-hour period, resulting in approximately one additional truck per hour during the Project's 3-year operating period. This incremental increase in heavy truck traffic would remain far below thresholds that would measurably affect Highway Capacity Manual performance metrics, including freeway density and ramp terminal control delay. The small increase in heavy truck traffic would not substantially alter heavy-vehicle proportions, operating speeds, or queuing conditions.

Given the minimal change relative to existing traffic volumes and roadway capacity, Project O&M traffic would not result in a discernible change in roadway operations or LOS on I-80 or USA Parkway and therefore would not constitute a significant traffic impact. Local access roads to the Project site, including Denmark Drive and Peru Drive, service the industrial center and are expected to be able to support O&M traffic.

3.8.3 Mitigation and Resource Protection Measures

The Project would not substantially impact current traffic conditions and transportation networks in the area; therefore, no mitigation measures or other resource protection measures are proposed.

3.9 Visual Resources

3.9.1 Existing Setting

The term visual character refers to the overall visual appearance of a given landscape based on the visual aspects of the landscape's vegetation, landforms/water, and human-made modifications. Visual impacts are considered in the UEPA process when utility-scale projects may alter the scenic character of rural or natural landscapes.

The Project site is in the TRI Center. The TRI Center is generally characterized by its large industrial facilities and infrastructure. The Project site is bordered by several existing industrial facilities, construction sites, and vacant land. Views in most directions are obstructed by existing industrial facilities and ongoing development. To the northwest of the Project site is a

large hill. Existing utility infrastructure is located west of the Project site. A photo of the Project site is included below. Land use in and surrounding the Project site is Industrial (Storey County 2024a).

The vegetation in the Project site is generally characterized as Intermountain Basins Semi-Desert Shrub Step community type and dominated primarily by broom snakeweed. The herbaceous layer is characterized predominantly by the invasive annual grass, cheatgrass, and an unidentified, but common, spreading ground cover plant. The Project site remains in a natural state, but surrounding areas have been graded for ongoing construction activities for data center development and associated facilities.

An existing 120 kilovolt (kV) power transmission line is visible on the nearby hill, and the West Tracy to Comstock Meadows 345 kV transmission line is currently under construction within the Project viewshed. Viewer groups surrounding the Project site include industrial workers from nearby facilities, construction workers from nearby sites, and travelers using nearby roadways.

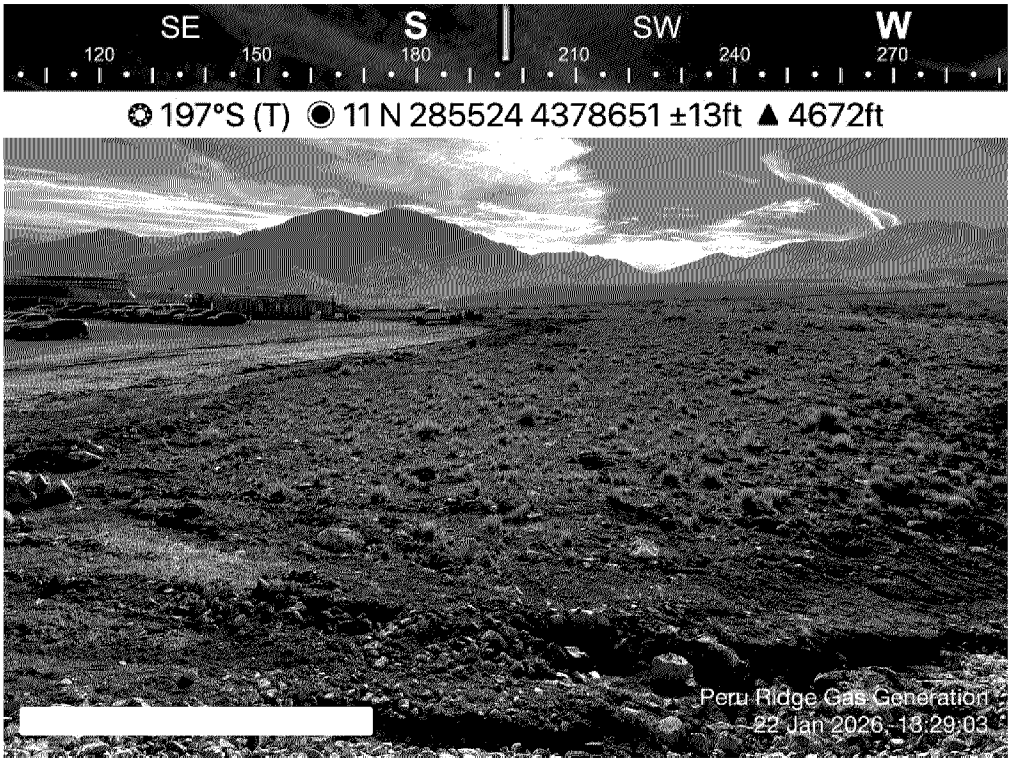


Photo 1. View from existing private access road facing south towards the Project site.

3.9.2 Environmental Consequences

The Project is compatible with the Storey County Master Plan and the surrounding areas. Project components would be visible to industrial workers, construction workers, and travelers,

but would be consistent with existing facilities and infrastructure in the immediate vicinity as well as the greater region encompassing TRI Center.

During construction, contrasting colors of vehicle and equipment movements from construction areas would be visible to viewer groups in the area; however, these activities are consistent with existing activities associated with TRI Center and surrounding construction sites. Visual impacts from construction would be short-term and minimal, occurring only during the construction period.

During operations, the gas generation facility has the potential to be visible to viewer groups; however, the Project components are consistent in character with existing infrastructure in the area and would be consistent with the industrial setting. Impacts during operations would be minimal.

3.9.3 Mitigation and Resource Protection Measures

The Project would not impact current visual resources in the area; therefore, no mitigation measures or other resource protection measures are proposed.

3.10 Noise

3.10.1 Overview

This section describes noise in relation to construction and operation of the Project, including a review of existing noise levels, how the noise generated by the Project would impact sensitive receptors, and any necessary mitigation measures to reduce impacts. Sensitive receptors are areas where humans or wildlife would be particularly affected by an increase in noise.

Noise is considered a subset of sound that is generally perceived as loud, unpleasant, unexpected, or undesired. Typical effects on humans from increased environmental noise include irritability, stress, and lack of sleep. Effects on wildlife include disorientation, stress, area avoidance, altered behavior patterns, and physiological and fitness effects. The intensity of these effects depends on the loudness, pitch, and duration of the sound.

Sound is measured in decibels (dB), which is a logarithmic scale in which the general rule of thumb is that a 10-dB increase in sound is perceived as a doubling of loudness by the human ear. Changes of 1 dB are generally imperceptible to the human ear, but 5 dB are clearly noticed.

Noise is often characterized using A-weighted decibels (dBA), which emphasizes the sound frequencies to which human ears are more sensitive (middle frequencies) and deemphasizes the sound frequencies to which human ears are less sensitive (high and low frequencies). For reference, the sound levels in a normal human conversation range from 60 to 65 dBA, quiet suburban neighborhoods typically have ambient noise levels of 40 to 50 dBA, and neighborhoods near arterial streets have ambient noise levels of 50 to greater than 60 dBA.

Sound from localized sources (point sources) spreads out as it travels through the air, dropping in loudness (attenuating) at a rate of 6 dBA for each doubling of distance. Sound from line sources, such as a highway, typically attenuates at a rate of 3 dBA for each doubling of distance or 4.5 dBA if the substrate between the line source and the sound receptor helps to dampen sound, such as vegetation. Solid structures, such as buildings or raises in topography, that block the line of sight between a noise source, and a receptor also increase the rate of sound attenuation.

3.10.2 Existing Setting

The Project site is located approximately 22 miles southeast of Reno, Nevada, and approximately 2.7 miles south of the I-80 and USA Parkway interchange. The Project site is within a data center development area that is currently under construction. The current noise environment in and around the Project site consists primarily of traffic noise from the USA Parkway, active construction within the TRI Center, and existing facility operational noise. Typical ambient noise levels in active construction sites range from approximately 80 to 90 dB during daytime hours (American Society of Safety Professionals 2020).

The nearest sensitive receptor is the McCarran Ranch Preserve located in Patrick, Nevada, approximately 3 miles west of the Project site and is used primarily by visitors for hiking and fishing.

3.10.3 Environmental Consequences

Construction

Construction of the Project would involve the use of noise-generating equipment such as trucks, generators, compressors, and earthmoving equipment. Construction-related noise would be temporary and would occur primarily during site preparation, equipment installation, and material delivery activities.

The Project site is located within an area undergoing active industrial development where similar construction activities already contribute to the daytime noise environment. Project construction would occur during the same hours as other construction activities in the surrounding area and would therefore be consistent with existing noise conditions.

The Project site is located within an area undergoing active industrial development where similar construction activities already contribute to the daytime noise environment. Project construction would occur during the same hours as other construction activities in the surrounding area and would therefore be consistent with existing noise conditions.

Construction is expected to occur for up to 10 hours per day, six days per week, typically between 7:00 a.m. and 5:00 p.m., Monday through Saturday. These hours fall within the Storey County exemption period for construction activities, which allows construction noise between 7:00 a.m. and 7:00 p.m., except Sundays and federal holidays.

Because construction noise would be temporary, would occur during daytime hours, and would occur in an area where similar construction activities are already present, construction noise impacts would be short-term and minimal.

Operation and Maintenance

Noise generated by the Project during operation would primarily result from the operation of natural gas-fired Jenbacher J420 generators and limited diesel-powered equipment, including Tier 4 diesel generators used for emergency or temporary purposes.

Manufacturer-provided sound data indicate that individual gas-fired generators produce sound pressure levels of approximately 85 to 90 dBA at a distance of 1 meter from the unit (Aggreko 2024).

Operational noise levels were evaluated using the dBmap noise modeling platform in accordance with ISO 9613-2, an internationally accepted standard for predicting outdoor sound propagation. The model assumed simultaneous operation of all generators under conservative conditions and evaluated sound levels at a receptor height of 1.5 meters above ground surface. Noise modeling results indicate that predicted operational noise levels attenuate to below 55 dB(A) at 660 feet with all 136 J420 engines running (dbmap 2026). These levels are consistent with typical ambient noise levels expected within an industrial development area.

According to the EPA's noise guidelines, outdoor noise levels of 55 dBA Ldn or less are considered protective of public health and welfare for residential land uses (EPA 1974). Because the nearest residential receptors are located approximately 3 miles from the Project site, modeled operational noise levels would attenuate well below this threshold before reaching those locations; therefore, operational noise generated by the Project would not substantially increase noise levels at nearby receptors and would be consistent with the existing industrial noise environment. Impacts from operational noise would be minimal.

3.10.4 Mitigation and Resource Protection Measures

The Project would not impact current noise conditions in the area; therefore, no mitigation measures or other resource protection measures are proposed.

3.11 Waste Management and Hazardous Materials

3.11.1 Existing Setting

Hazardous materials are substances that could endanger public and/or environmental health if released into the environment. Examples of hazardous materials include fuels and lubricants. Non-hazardous waste is discarded materials that would not endanger public and/or environmental health if released into the environment and typically includes common items, such as food packaging and construction debris.

A Phase I Environmental Site Assessment was conducted by Bureau Veritas on May 1, 2023 (Bureau Veritas 2023). As part of the assessment, past and present conditions of the site were reviewed to ascertain whether there had been any history of contamination by hazardous materials. The assessment uncovered no evidence of recognized environmental conditions, controlled recognized environmental conditions, historical recognized environmental conditions, or other significant findings. No evidence of hazardous materials, petroleum products, or waste generation, storage, or disposal was found onsite (Bureau Veritas 2023).

3.11.2 Environmental Consequences

Non-Hazardous Waste

During both construction and operation of the Project, the primary waste generated is expected to be non-hazardous solid waste, including paper, wood, glass, plastic, and metal waste as described in more detail in Section 2.5.2. Non-hazardous solid waste could also include rags, machine parts, electrical materials, and empty containers. There could also be some liquid non-hazardous waste, such as lubricants, beverages, or cleaning water.

Non-hazardous waste, if not contained and properly disposed of, could cause local impacts, such as injury, entrapment, or mortality of wildlife; degradation, of vegetation communities and habitat; and injury or exposure to humans traversing the area. Soils and water sources have the potential to become contaminated and cause harm to plants and wildlife. To reduce these impacts, non-hazardous waste products would be contained within appropriate storage containers and would be recycled or disposed of at the appropriate facilities according to local regulations. With the implementation of BMPs and mitigation measures, impacts would be avoided or minimized.

Hazardous Waste

Hazardous waste generated during construction would include liquid solvents. There would also be some solid hazardous waste, such as welding materials and dried paint. During operation, the hazardous materials used are expected to be limited in quantity and would include both liquid and solid waste products. The hazardous materials that are expected to be used during operation of the Project include oils, fuels, solvents, mineral insulating oil, and other chemicals used for various purposes; the complete list is available in Section 2.5.2.

Potential impacts include contaminated soil because of spills associated with construction activities. To prevent and reduce the potential impacts that could be caused by the release of hazardous waste products, BMPs, plans, and mitigation measures would be implemented. The site would eventually have over 1,320 gallons of oil containing materials onsite and would be required to have an SPCC Plan, and along with the SWPPP would be developed to manage the discharge of pollutants from construction activities and provide procedures used to prevent spills. Spills that meet the criteria listed under NAC 445A.347 must be reported to NDEP within one working day.

Measures to reduce potential impacts include proper containment of hazardous materials according to local regulations, prohibiting the burning of any materials onsite, and maintaining spill cleanup kits on hand in the locations where hazardous materials are handled. Hazardous waste would be disposed of as required by Resource Conservation and Recovery Act (RCRA) regulations and would be managed onsite as required. Additionally, equipment and spill containment facilities would be inspected monthly to confirm they are in good working condition and to catch potential leaks as soon as possible.

A Hazardous Materials Inventory Reporting Permit would be prepared in accordance with NAC 477.323 and the International Fire Code, 2018 Edition (NAC 477.281) and submitted to the Nevada Department of Public Safety and the State Fire Marshal's Division per NRS 459.744 and NAC 459.9918. The power generation facility would be operated in compliance with all applicable federal, State, and local regulations. With the implementation of waste management plans, measures, and permits, the Project would not cause significant environmental impacts resulting from hazardous materials.

3.11.3 Mitigation and Other Resource Protection Measures

The following BMPs and mitigation measures will be implemented to prevent and reduce potential impacts associated with hazardous materials and non-hazardous waste. Unless otherwise specified, measures apply to construction and operation of the Project.

- Construction sites, staging and laydown areas, and access roads will be kept clear of debris and waste.
- Refuse and trash will be appropriately contained and removed from the Project site and disposed of in accordance with local regulations.
- Construction debris, including temporary stakes and flags, will be appropriately contained and removed from the Project site once they are no longer in use and stored or disposed of in compliance with local regulations.
- Oil or fuel from vehicles and construction equipment will not be drained onto the ground but rather into appropriate containment devices and disposed of according to regulations.
- Oils or chemical waste products will be contained and disposed of in accordance with regulations.
- Spill cleanup kits will be located at all oil, solvent, and/or waste storage areas per RCRA requirements so that fluid spills or leaks can be contained, cleaned, and properly disposed of as soon as possible. Within facilities, spill cleanup kits will be located near all locations where hazardous liquids will be handled such that access to the kit is quick and easy to facilitate immediate containment and cleanup of spills.
- Wastewater will be collected in self-contained systems that will be pumped and disposed of in accordance with local requirements.
- Waste will not be burned onsite.

- The Project will prepare and implement a SWPPP that will include BMPs to prevent contamination of waters by hazardous materials.
- Equipment and spill containment facilities will be inspected on a monthly bases, per EPA requirements.

3.12 Socioeconomics

3.12.1 Existing Setting

Demographics

The Project site is located within the 107,000-acre TRI Center in Storey County, Nevada and is generally located 2.7 miles south of the I-80 and USA Parkway interchange and 0.5 miles west of USA Parkway. Based on a review of satellite imagery, the nearest sensitive receptor is the McCarran Ranch Preserve located in Patrick, Nevada, approximately 3 miles west of the Project site and is used primarily by visitors for hiking and fishing. The nearest residence is located approximately 3 miles west of the Project site. According to the Headwaters Economics Economic Profile System, the population of Storey County was estimated at 4,139 people in 2023, a 3.1 percent increase since 2020 (Headwaters Economics 2025). Of the total population in 2023, the racial category with the highest estimated percent of the population was white alone (87.7 percent), followed by two or more races (8.9 percent), African American alone (1.9 percent), and Asian alone (1.0 percent) (Headwaters Economics 2025). Environmental justice populations are defined by the USEPA as a community that has a higher proportion of minority or low-income populations than an identified reference community. Storey County has a higher proportion of white, non-Hispanic residents and lower proportion of low-income residents when compared to those in Nevada.

Income

In 2023, the average income was estimated at $50,554 and the median household income was estimated at $96,000. The income bracket most prevalent in 2023 was $100,000 to $149,000, accounting for 23.5 percent of households. Labor earnings accounted for most of the household income (61.6 percent) followed by public assistance in the form of Social Security (59 percent). The U.S. Census Bureau uses a set of income thresholds that vary by family size and composition to detect who is poor. If the total income for a family or an unrelated individual falls below the relevant poverty threshold, then the family or individuals is classified as "below the poverty level". The number of families and individuals living below the poverty line in Storey County is estimated to be 20 families (1.9 percent) and 292 individuals (7.1 percent).

Employment

The primary industries in Storey County are education, health care, and social assistance and manufacturing, which account for 19.4 percent and 17.9 percent, respectively, of the total workforce. Other industries include management, professional, administrative, and waste management (12.2 percent), retail trade (10.4 percent), and construction (7.7 percent) (Headwaters Economics 2025). Of the total estimated workforce in 2023, 32.2 percent of people

are estimated to have worked within their county of residence while 67.8 percent of people are estimated to have commuted and worked outside of their county of residence (Headwaters Economics 2025).

Housing

The total housing units available in Storey County in 2023 were estimated at 2,112 units. Of the 2,112 available units, 1,874 units were occupied (88.7 percent), and 238 units were vacant (11.3 percent). Approximately 60 percent of Storey County's housing units are single-family residential dwellings, with 28 percent being mobile and manufactured homes. The remaining residential dwellings are multi-family or single-family attached units. The median monthly mortgage cost in 2023 was $1,821 and the median gross rent was $1,007. Approximately 34.9 percent of owner-occupied households and approximately 44.9 percent of renter-occupied households spent greater than 30 percent of total household income on mortgage costs and rent, respectively.

3.12.2 Environmental Consequences

The Project is expected to create temporary employment during construction of up to 25 people over 24 months and approximately five permanent jobs for O&M activities. The temporary construction jobs and associated income would be the primary driver of positive economic benefits to Storey County. It is anticipated that most temporary workers would reside in Washoe County and commute to the Project, while a small portion of the workers may relocate to the area. Storey County has vacant housing units available to accommodate the relocation of some of these workers. Because most temporary workers are not expected to reside in Storey County, the population is not expected to increase significantly during the construction phase; therefore, the impact on population and temporary housing would be minimal.

The income generated from temporary and permanent employment would benefit the region by supporting local businesses. Workers would spend their earnings on various services and products including food, transportation, accommodations, retail stores, and medical services. The State of Nevada and Storey County would benefit from tax revenues associated with the property and from the construction and operation of the Project.

The nearest sensitive receptor is a residence located approximately four miles west of the Project site. The Project would not have long-term or adverse health or environmental impacts; therefore, the Project would not disproportionately impact environmental justice or poverty populations.

3.12.3 Mitigation

Potential impacts to socioeconomic conditions may be beneficial; therefore, no mitigation measures or other resource protection measures are proposed.

3.13 Fire Management

3.13.1 Overview

Wildfires are uncontrolled fires spreading through vegetative fuels. Wildfires in the arid west can cause devastating damage to human structures and entire ecosystems. Wildfires can also cause human deaths and the mortality of vegetation and wildlife.

Invasive plant species, especially annual grasses, can create greater fire risk in areas because of their highly flammable nature and their ability to quickly spread across an area, often causing large, dense infestations that restrict the ability of other, less flammable plants to grow in those areas. Fires in areas invaded by such plants can be larger and more destructive than fires in areas with native, more fire-resistant vegetation.

Human activities in landscapes that are prone to fires can increase the risk wildfire. This section analyzes the risk of wildfire associated with the Project.

3.13.2 Existing Setting

The Project site is located in northern Nevada in an area characterized by hot, dry summers and frequent strong winds. Fire risk in this area is high, especially during the summer after a dry winter (most precipitation in this region comes as snow during the winter). Wildfires can start naturally in this area, usually by lightning strikes. Naturally caused wildfires usually remain relatively small. Human-caused ignitions are also fairly common in this region and can often result in larger fires. Any fire can quickly become larger under high wind conditions, which are common in this region.

Vegetation in the Project site is dominated by low shrubs that are relatively resistant to fire. However, cheatgrass was observed growing throughout the Project site between the shrubs in low densities. Cheatgrass is an invasive, nonnative, annual grass that can quickly take over disturbed soils and is highly flammable. No dense infestations of cheatgrass are currently present in the Project site.

3.13.3 Environmental Consequences

Existing anthropogenic sources of fire risk occur in or near the Project site. Vehicles and equipment associated with the development of the broader data center contain combustible fuels. Personnel working in this area could discard ignition sources, such as cigarettes. Construction activities could produce sparks that could start a fire, such as welding. Existing facilities in the industrial area contain combustible items, such as chemicals, fuels, and paper waste. The NV Energy transmission lines directly to the west of the Project site could also start a fire if a line were to break.

The environmental consequences of a wildfire breaking out because of the Project could be devastating and far-reaching. As described above, people could lose lives and property and whole landscapes could be destroyed, including the mortality of general vegetation and wildlife

and special status species. The effects of a large and destructive fire could be long-term. Ecosystems could take decades to recover, and some would never recover to pre-fire conditions without human intervention.

Construction and operation of the Project could introduce new fire risks to the Project region. Construction activities that produce sparks could ignite a wildfire. Vehicles or equipment started within tall vegetation could ignite the vegetation. The Project would produce combustible material that could add to the fuel load in the area, such as paper and wood waste or rags used to clean up flammable liquids, like oils, fuels, or chemicals. The power generation facility would contain flammable materials, including fuels, oils, solvents, and chemicals. To reduce the fire risk, the following measures would be implemented: areas in which construction activities that could produce sparks, like welding, would be cleared of combustible material prior to the activity; vehicles and equipment would be parked outside of tall vegetation; and combustible materials would be contained away from ignition sources.

Construction and operation of the Project could also introduce or spread invasive weeds, such as cheatgrass, that could increase the risk of wildfire and the potential for more damaging fire within the Project site. Seeds of invasive plants could be carried on vehicles, equipment, or personnel clothing. To reduce the risk of causing larger infestations of invasive weeds, the Project will develop and implement BMPs to prevent the introduction and spread of noxious or nonnative, invasive weeds. Temporarily disturbed soils will be revegetated with native plant species following construction to reduce the risk of invasive weeds becoming established and causing dense infestations.

Additional fire prevention and suppression measures that would be implemented by the Project to reduce fire risk include: developing and implementing a Fire Management and Response Plan that includes specific plans for brush or equipment fires; keeping fire suppression equipment in vehicles and facilities; training personnel and contractors in BMPs to prevent fires and the use of fire suppression equipment in the event a fire breaks out; prohibiting campfires onsite; restricting smoking to designated areas; and maintaining vegetation in a way that reduces fire risk from vegetation interaction with Project facilities. With the implementation of these measures and those stated above, the risk of Project-related wildfire would be reduced to an acceptable level.

3.13.4 Mitigation and Other Resource Protection Measures

The following BMPs will be implemented to reduce the risk of fire starting as a result of the Project. Unless otherwise specified, measures apply to construction and operation of the Project.

- A Fire Management and Response Plan will be developed and implemented that includes specific plans for brush or equipment fires.
- Fire suppression equipment will be kept in Project vehicles, equipment, and facilities, and Project personnel and contractors will be trained in the use of this equipment.

- Project personnel and contractors will be trained in fire risk reduction measures, including the importance of not discarding burning objects, such as cigarettes or matches, in a way that could ignite combustible material.
- Campfires will not be allowed onsite, and smoking will be restricted to designated areas away from combustible materials.
- Vehicles and equipment will be parked away from tall vegetation to eliminate the risk of igniting a fire when the vehicle or equipment is started.
- Welding sites will be cleared of combustible material if present to minimize fire risk.
- Combustible material produced by the Project, such as paper products or rags used to clean oils or fuels, will be appropriately contained away from ignition sources.
- BMPs to prevent the introduction and spread of invasive weeds, including those that increase fire risk, such as cheatgrass, will be developed and implemented. See additional detail in Section 3.5.4.
- Temporarily disturbed soils will be revegetated as soon as construction activities have ceased in that area. Revegetation will include replanting or seeding with native plants that are generally more fire resistant than invasive weeds. Revegetation with native plants would help to prevent invasive weeds from invading and causing dense infestations. Revegetation success will be monitored and reported to the PUCN as described in more detail in Section 3.5.4.
- Vegetation around the Project facilities will be maintained to prevent or minimize the risk of fire resulting from contact with the Project facilities.

4 List of Preparers and Reviewers

A list of preparers and reviewers is provided in Table 9.

Table 9 List of Preparers and Reviewers

Name	Organization	Title
Jeff Tarde	Tract	Director, Energy Environmental
Dennis Bartlett	Tract	VP, Utility Development
Jeevitha Aruchamy	Fleet	Director, Planning and Delivery
Tania Treis	Panorama Environmental	Project Director/QA/QC
Colleen Lavery	Panorama Environmental	Project Manager
Abby Matanis	Panorama Environmental	Deputy Project Manager, Environmental Specialist
Nicci Beedle	Panorama Environmental	Environmental Specialist
Teresa Campbell	Panorama Environmental	Senior Biologist

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Appendices

Appendix A: Approved Jurisdictional Determination

Exhibit G

PUBLIC UTILITIES COMMISSION OF NEVADA
DRAFT NOTICE
(Applications, Tariff Filings, Complaints, and Petitions)

Pursuant to Nevada Administrative Code ("NAC") 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(5)(a)):

Application of PR RNO Property Owner 1, LLC for a Permit to Construct a temporary 218 MW natural gas power generation facility (the "Peru Ridge Generation Facility") under the Utility Environmental Protection Act.

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(5)(b)):

PR RNO Property Owner 1, LLC

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled **AND** the effect of the relief or proceeding upon consumers (see NAC 703.160(5)(c)):

PR RNO Property Owner 1, LLC respectfully requests that the Commission issue an order approving this Application to construct a temporary 218 MW natural gas power generation facility, the Peru Ridge BTM Self-Generation Project, located on privately owned industrial land within the Tahoe Reno Industrial Center in Storey County, Nevada. The facility will consist of one hundred thirty-six (136) Jenbacher J420 natural gas-fueled generators (approximately 1.6 MW each, 218 MW total), six (6) Volvo Penta Model TWD1683GE Tier 4 diesel black start engine gensets, seventy-two (72) medium voltage transformers, and one hundred thirty-six (136) selective catalytic reduction (SCR) systems, together with associated switchgear, protection equipment, control and relay enclosures, utility trenches, and all necessary appurtenances and devices. The facility is designed to provide temporary behind-the-meter electrical power for a data center campus while NV Energy installs permanent utility infrastructure to serve the site. The facility is expected to operate for approximately two to three years. These facilities will be constructed on privately owned industrial land and will not affect rates or service to existing NV Energy customers.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute ("NRS") 704.069(1)[1]:

[1] NRS 704.069 states in pertinent part:

1. Except as otherwise provided in subsections 9 and 11 of NRS 704.110, the Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110, inclusive, in which:

(a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale, an annual deferred energy accounting adjustment application pursuant to NRS 704.187 or an annual rate adjustment application; and

(b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed $50,000 or 10 percent of the applicant's annual gross operating revenue, whichever is less.

A consumer session is not required.

If the draft notice pertains to a tariff filing, please include the tariff number **AND** the section number(s) or schedule number(s) being revised.

This draft notice does not pertain to a tariff filing.

Exhibit H

Outlook

Thank you for placing your order with us.

From Reno Legals <legals@rgj.com>
Date Mon 4/6/2026 4:21 PM
To Dallas A. Harris [redacted]>

You don't often get email from legals@rgj.com. Learn why this is important

THANK YOU for your ad submission!

This is your confirmation that your order has been submitted to publish in the Public Notice/Classified section of the paper. Below are the details of your transaction. Please save this confirmation for your records.

We appreciate you using our online self-service ads portal, available 24/7. Please continue to visit Reno Gazette-Journal's online Classifieds HERE to place your legal notices in the future.

Deadlines vary by publication, changes and/or cancellations may not be honored due to deadline restrictions.

Job Details

Order Number: LNVS0494898
Classification: Public Notices
Package: General Package
Additional Options: 1 Affidavit $[redacted]
Base amount: [redacted]
Service fee: [redacted]
Cash/Check/ACH [redacted]
Discount: -$0.00
Total payment: [redacted]

As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save! In no event are service fees refundable.

Payment Type: mastercard

Account Details

Dallas Harris
[redacted]
Davison Van Cleve
Credit Card - [redacted]

Schedule for ad number LNVS04948980

Wed Apr 8, 2026
Reno Gazette-Journal *All Zones*
"

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA NOTICE OF APPLICATION

PR RNO Property Owner 1, LLC ("PR RNO") intends to submit an application for a permit to construct, operate and maintain the Peru Ridge Self-Generation Project, consisting of natural gas-fueled electrical generating facilities located in Storey County, Nevada. This request for a permit to construct will be filed with the Public Utilities Commission of Nevada ("Commission") pursuant to the Utility Environmental Protection Act ("UEPA") set forth in Nevada Revised Statutes ("NRS") NRS §§ 704.820 to 704.900 and Nevada Administrative Code 703.423 and 703.415.

Notice is hereby given to persons residing in the municipalities in which the utility facility to be constructed will be located. PR RNO will request a permit to construct, operate and maintain the following utility facilities:

A temporary natural gas-fueled power generation facility located on approximately 20.9 acres within the Tahoe Reno Industrial Center in Storey County, Nevada. The facility will consist of 136 natural gas-fueled generators (approximately 218 MW total capacity), six diesel black start engine gensets, 72 medium voltage transformers, 136 selective catalytic reduction systems, and associated natural gas compression and fuel delivery infrastructure. The facility will supply electrical power exclusively for on-site consumption at the Peru Ridge data center campus.

The contents of the UEPA Application will include, among other things:

a) A description of the proposed facilities requiring a permit to construct from the Commission and its location, including a description of any associated equipment and diagrams of the location and layout of the proposed utility facility;

b) An environmental statement that describes the environmental characteristics of the project area, the potential environmental impacts from the construction and specific mitigation measures to be implemented to reduce those impacts;

c) A list of federal, state, regional and local agencies whose approval may be required for the proposed utility facility; and

d) An explanation of the extent to which the proposed utility facility is needed to ensure reliable service to electric customers within this state.

e) A description of any reasonable alternate location(s) for the Proposed Project, a description of the comparative merits or detriments of each location submitted, and a statement of the reasons why the primary proposed location is best suited for the facility.

f) Proof that a copy of the notice has been submitted to the Nevada State Clearinghouse within the State Department of Conservation and Natural Resources.

g) Proof that a public notice of the application was given to the persons residing in the municipalities entitled to receive notice by the publication of a summary of the application in newspapers published and distributed in the area in which the utility facility is proposed to be located.

The UEPA application will be filed under and governed by the provisions of the UEPA. Protests and written comments about the granting of the UEPA application must be filed with the Commission as provided by law.

PR RNO Property Owner 1, LLC

April 8 2026

LNVS0494898

Exhibit I

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the **Application of PR RNO Property Owner 1, LLC for a Permit to Construct the Proposed Peru Ridge Self-Generation Project in Storey County, Nevada, Under the Utility Environmental Protection Act** in Docket No. 26-04___ upon all parties of record in this proceeding by electronic service to the following via electronic mail:

Don Lomoljo
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Mr. Greg Lovato, Administrator
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Nevada Department of Wildlife
Habitat Division - AB307
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jkleiber@ndow.org

DATED this 20th day of April 2026.

/s/ Dallas Harris
Dallas A. Harris
Of Counsel
Davison Van Cleve, PC