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26-05007

Public Utilities Commission of Nevada
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In accordance with NRS Chapter 719,
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by: /s Caitlin Katzenbach

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October 13, 2026

Ms. Trisha Osborne, Assistant Commission Secretary
Public Utilities Commission of Nevada
Capitol Plaza
1150 East William Street
Carson City, Nevada 89701-3109

RE: Docket No. 26-05007- Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2027-2046 Triennial Integrated Resource Plan and 2027-2029 Energy Supply Plan.

Dear Ms. Osborne:

On May 6, 2026, Sierra Pacific Power Company d/b/a NV Energy ("Sierra") and Nevada Power Company d/b/a NV Energy ("Nevada Power" and, together, the "Companies") filed their Joint Application seeking approval of their 2027-2046 joint triennial integrated resource plan ("2026 Joint IRP"). On September 24, 2026, the Companies submitted an erratum making certain corrections to portions of the 2026 Joint IRP.

This erratum includes clean versions of the pages and documents that are updated, as well as redlined versions provided as Exhibit A. These corrections do not materially affect the outcome of the Companies' analyses or the selection of the Preferred Plan.

- In the Companies September 24, 2026 erratum, in the correction made to page 6 of Exhibit A, the cost in thousands associated with the Gonder 345 kV line Terminal project was erroneously listed as "\$3,445" in the clean version provided. The correct cost of \$1,800 was included in the redline version of the September 24, 2026 erratum, but the clean version is corrected here;
- The calculations supporting the Companies' proposed eligible load are corrected in the direct testimony of Tim Pollard at Q&A 37 and 42 and in Exhibit Pollard-Direct-3, as well as pages 17, 18, and 20 of the Load Forecast Narrative and pages 85, 86, 87, 88, and 90 of Technical Appendix LF-1, Vol. 7. The revised confidential workpaper supporting the calculation is being provided with this erratum.

Ms. Osborne
October 13, 2026
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Certain information provided with workpapers associated with the direct testimony of Tim Pollard is commercially sensitive and is subject to protection pursuant to NRS § 703.190. Specifically, the confidential workpapers include customer-specific information, business assumptions and forecasts made by the Companies. Public disclosure of this non-public financial information can harm the Companies. The confidential workpapers supporting the Exhibits are being provided via the attached storage device.

Pursuant to NAC § 703.5274(2), the Companies hereby request that the above-described information not be disclosed to the public. The Companies request that this information remain confidential for a period of five years after which the information may be destroyed or returned.

Should you have any questions regarding this filing, please contact me at 775-834-3470 or at Roman.Borisov@nvenergy.com.

Sincerely,

/s/ Roman Borisov
Roman Borisov
Senior Attorney

Brooks 138/12 kV transformer	2030	Nevada Power	Las Vegas	\$	25,000	Add 138/12 kV 33 MVA transformers, construct 12 kV get aways
Coyote Creek-Falcon 345 kV line	2030	Sierra	Valmy	\$	66,000	Construct new Coyote Creek - Falcon 345 kV line, reconfigure high and low side bus of Falcon substation
Olinghouse-Chukar 345 kV line	2030	Sierra	TRIC	\$	38,000	Construct new Olinghouse-Chukar 345 kV line
Robinson Summit third 345 kV PST and third 525/345 kV transformer	2030	Sierra	Ely	\$	55,000	Add third 345 kV PST and third 525/345 kV transformers at Robinson Summit substation
Esmeralda-Millers 230 kV line	2030	Sierra	Tonopah	\$	120,000	Construct new Esmeralda-Millers 230 kV line, reconstruct Millers to accommodate 230/120 kV 150 MVA transformer
Interconnection of Big Smokey lead line at Millers	2030	Sierra	Tonopah	\$	20,000	Reconstruct Millers to accommodate new generator lead line
Wassuk lead line for Mason	2030	Sierra	Yerington	\$	2,000	Add 120 kV line terminal at Wassuk substation
Candelaria 120 kV switching station	2030	Sierra	Yerington	\$	30,000	New Candelaria switching station with 120 kV lead line position for Excelsior Geothermal project
#124 line clearance mitigations	2030	Sierra	Yerington	\$	500	Replace five (5) structures to increase line clearances
Walker River 120 kV line terminal	2028	Sierra	Yerington	\$	6,300	Construct 120 kV line terminal position for generator lead line
Walker River 345/230 kV transformer #3	2030	Sierra	Yerington	\$	25,000	Add third 345/120 kV transformer at Walker River
Walker River 230 kV line terminal	2030	Sierra	Yerington	\$	3,000	Construct 230 kV line terminal position for generator lead line
Walker River 345 kV line terminal	2030	Sierra	Yerington	\$	3,000	Construct 345 kV line terminal position for generator lead line
Miller 138 kV line terminal	2030	Nevada Power	Las Vegas	\$	600	Construct 138 kV line terminal position for generator lead line
Crystal 525 kV line terminal	2030	Nevada Power	Las Vegas	\$	5,870	Construct 500 kV line terminal position for generator lead line
Gonder 345 kV line Terminal	2028	Sierra	Austin	\$	1,800	Construct 345 kV line terminal position for generator lead line
Gonder generator run back RAS	2028	Sierra	Austin	\$	1,100	Construct generator run back RAS, loss Gonder 345 kV connection to Robinson Summit

36. Q. **HOW ARE THE ANNUAL LIMITS FOR THE ACTION PLAN PERIOD DETERMINED?**

A. Following the methodology approved in the 2021 Joint IRP, in this proceeding the Large C&I year-end sales growth over the three-year Action Plan Period, January 1, 2027, through December 31, 2029, is calculated as the difference in the year-end sales for 2029 minus the three-year average of actual annual Large C&I loads during the 2023–2025 period. Thus, the difference between the load at the end of 2029 yields the Action Plan Period load growth under normal economic conditions.

Similar to previous IRP calculations, in addition to this base year load calculation, loads for individual customers on tariff schedules with non-standard, fully-bundled price options (e.g. GS-4 New Generation – GS-4-NG, Large Customer Market Price Energy – LCMPE, Market Price Energy – MPE, or the Economic Development Rate Rider – EDRR tariffs) were excluded from the load growth calculations for both utilities. This adjusted difference in load is then reduced by 50 percent to reflect the requirement that the eligible loads are offset by future expected growth in Large C&I customer sales.

37. Q. **WHAT ARE THE RESULTING LOAD LEVELS ELIGIBLE TO LEAVE BUNDLED SERVICE UNDER 704B FOR THE CURRENT THREE-YEAR ACTION PLAN PERIOD?**

A. As detailed in Section 6 of the Load Forecast Narrative and Section IV of Technical Appendix LF-1, the proposed eligible loads, which represent annual limits for the entire Action Plan Period as summarized below in Table Pollard-Direct-10, are 58,982 MWh for Nevada Power. Due to the lack of import capacity at Sierra, the limit for Sierra has been set to zero MWh in this proceeding. The required non-load

growth factors that determine the eligible annual limits, as identified in both NRS 704.741(6) (i.e., “import capacity, system constraints, and the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limit”) and applicable regulations, were considered for both utilities, but only have an impact on the proposed limits for Sierra (due to lack of import capacity).^{6, 7}

**TABLE POLLARD-DIRECT-10
704B ELIGIBLE LOADS**

	2027	2028	2029
<u>Nevada Power</u>			
Total Annual MWh Sales	24,363,758	25,921,380	28,127,362
Eligible Annual Limit MWh Loads	19,661	19,661	19,661
Modified Sales	24,344,097	25,901,719	28,107,701
Annual MW Peak	6,705	6,865	7,369
Coincident MW Peak of Eligible Loads	6.7	6.7	6.7
Modified MW Peak	6,698	6,858	7,362
<u>Sierra</u>			
Total Annual MWh Sales	13,307,068	16,743,505	19,529,589
Eligible Annual Limit MWh Loads	-	-	-
Modified Sales	13,307,068	16,743,505	19,529,589
Annual MW Peak	2,598	2,951	3,242
Coincident MW Peak of Eligible Loads	-	-	-
Modified MW Peak	2,598	2,951	3,242

⁶ NRS 704.741(6) (“The Commission shall require the utility or utilities to include in the plan a proposal for annual limits.... In developing the proposal and the forecasts in the plan, the utility or utilities must use a sensitivity analysis that, at a minimum, addresses load growth, import capacity, system constraints and the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limit....”)

⁷ NAC does not specifically address NRS 704.741(6) nor set the specific 704B exit limits, but NAC 704.9061 on the Energy Supply Plan (ESP) and NAC 704.9156 on the Resource Plan (IRP), among other sections pertinent to ESP and IRP, address how action plans identify planned resources and transmission needs, which inform 704B implementation. NRS 704B.310(2) (Commission must find no adverse effect on reliability) and NRS 704B.325 (approval criteria and conditions) support NRS 704.741(6).

a rate for the Base Tariff Energy Rate net of out-of-the-money power purchase agreements costs (“Net Differential Energy Rate”) for a three-year transition period. In addition, the incremental Renewable BTER (“R-BTER”) rate and other public policy program rates shall be included on an ongoing basis for these customers’ bills. Further, any applicable additional costs related to decommissioning and remediation costs and regulatory asset charges must be imposed by the Commission on customers choosing to exit bundled service to begin taking service from a third-party energy provider.

42. Q. WHAT ARE THE PROPOSED ENERGY RELATED CHARGES PROPOSED IN THIS PROCEEDING?

A. **Exhibit Pollard-Direct-3** presents the proposed 704B rates for the 2026 Joint IRP three-year action plan period. Pursuant to subsection 1 of Section 2 of the implementing regulation, the Net Differential Energy Rate and the credit/charge for variable operations and maintenance (“O&M”) costs is determined in a triennial resource plan and is held constant for the duration of the corresponding three-year transition period.¹²

The results of the calculations demonstrate that Nevada Power customers choosing to exit the system will pay the Net Differential Energy Rate of \$0.03148 per kWh during their applicable three-year transition period which will be partially offset by the \$-0.00001 per kWh variable O&M costs credit. In addition, such customers will pay other costs required by law including the Base Tariff Energy Rate for the transmission period and the then-current R-BTER rate (which currently stands at \$0.00463 as filed in Docket No. 26-02013) and will be updated quarterly. The total effective BTER neutrality charge will be \$0.03610 per kWh.

¹² LCB File No. R195-22.

NEVADA POWER COMPANY

704B Rate Summary

2026 Joint IRP
Docket No. 26-05____
Exhibit Pollard Direct-3
Page 1 of 3

Line No.	Rate	Value	Notes	Source	Line No.
8	Fuel & Purchased Power (BTER) Charges				8
9	R-BTER	\$ 0.00463	Current R-BTER	Docket No. 26-06____	9
10	Net BTER	\$ 0.03148	Calculations on pg. 2	PLEXOUT	10
11	Variable O&M Credit	\$ (0.00001)	Calculations on pg. 3	PLEXOUT	11
12					12
13	Public Policy Rates	(1)	As applicable	Statement of Rates	13
14	Decommissioning and Remediation Charges	As applicable	As applicable		14
15	Regulatory Asset Charges	As applicable	As applicable		15
16	1) Eligible customers will pay public policy program rates of the applicable schedule as detailed on the current Statement of Rates.				16
17					17
18					18
19	Action Period MWh Eligible for 704B Process	118,099			19
20	Revenue Neutrality BTER Charges	\$ 4,263,902			20
21	Effective BTER neutrality charge per MWh	\$ 36.10			21
22					22

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Line No.		Base Case			Change Case			Difference			Line No.
		MWh	Costs (\$000)	\$/MWh	MWh	Costs (\$000)	\$/MWh	MWh	Costs (\$000)	\$/MWh	
10	2027										10
11	Jan	1,673,534	\$ 3,878	\$ 2.32	1,673,534	\$ 3,867	\$ 2.31	0	\$ (11)	\$ (0.01)	11
12	Feb	1,449,711	\$ 3,386	\$ 2.34	1,449,711	\$ 3,392	2.34	0	6	0.00	12
13	Mar	1,563,972	\$ 3,394	\$ 2.17	1,563,972	\$ 3,391	2.17	0	(3)	(0.00)	13
14	Apr	1,537,462	\$ 2,450	\$ 1.59	1,537,462	\$ 2,461	1.60	(0)	11	0.01	14
15	May	2,062,063	\$ 3,395	\$ 1.65	2,062,063	\$ 3,382	1.64	(0)	(13)	(0.01)	15
16	Jun	2,778,168	\$ 7,799	\$ 2.81	2,778,168	\$ 7,802	2.81	0	3	0.00	16
17	Jul	3,278,823	\$ 10,756	\$ 3.28	3,278,823	\$ 10,803	3.29	(0)	47	0.01	17
18	Aug	3,061,252	\$ 10,120	\$ 3.31	3,061,252	\$ 10,060	3.29	(0)	(60)	(0.02)	18
19	Sep	2,517,256	\$ 6,914	\$ 2.75	2,517,256	\$ 6,781	2.69	(0)	(132)	(0.05)	19
20	Oct	1,789,913	\$ 3,912	\$ 2.19	1,789,913	\$ 3,925	2.19	(0)	13	0.01	20
21	Nov	1,563,974	\$ 3,751	\$ 2.40	1,563,974	\$ 3,765	2.41	0	14	0.01	21
22	Dec	1,761,405	\$ 4,079	\$ 2.32	1,761,405	\$ 4,077	2.31	0	(2)	(0.00)	22
24	Total	25,037,533	\$ 63,833	\$ 2.55	25,037,533	\$ 63,705	\$ 2.54	(0)	\$ (128)	\$ (0.01)	24
27	2028										27
28	Jan	1,786,819	\$ 4,408	\$ 2.47	1,782,218	\$ 4,359	\$ 2.45	(4,601)	\$ (49)	\$ (0.02)	28
29	Feb	1,608,775	\$ 3,824	2.38	1,604,485	\$ 3,810	2.37	(4,290)	(14)	(0.00)	29
30	Mar	1,681,506	\$ 3,647	2.17	1,676,665	\$ 3,640	2.17	(4,841)	(6)	0.00	30
31	Apr	1,667,718	\$ 2,884	1.73	1,663,318	\$ 2,883	1.73	(4,399)	(1)	0.00	31
32	May	2,213,642	\$ 3,610	1.63	2,208,628	\$ 3,600	1.63	(5,014)	(10)	(0.00)	32
33	Jun	2,942,663	\$ 7,343	2.50	2,937,249	\$ 7,376	2.51	(5,414)	33	0.02	33
34	Jul	3,423,447	\$ 9,160	2.68	3,417,606	\$ 9,081	2.66	(5,841)	(79)	(0.02)	34
35	Aug	3,200,837	\$ 8,086	2.53	3,194,970	\$ 7,945	2.49	(5,867)	(141)	(0.04)	35
36	Sep	2,636,473	\$ 6,072	2.30	2,631,031	\$ 6,044	2.30	(5,442)	(28)	(0.01)	36
37	Oct	1,900,758	\$ 4,329	2.28	1,896,044	\$ 4,378	2.31	(4,714)	49	0.03	37
38	Nov	1,682,278	\$ 3,938	2.34	1,677,996	\$ 3,931	2.34	(4,282)	(7)	0.00	38
39	Dec	1,874,614	\$ 4,501	2.40	1,870,197	\$ 4,529	2.42	(4,417)	28	0.02	39
41	Total	26,619,531	\$ 61,802	\$ 2.32	26,560,408	\$ 61,577	\$ 2.32	(59,123)	\$ (225)	\$ (0.00)	41
44	2029										44
45	Jan	1,934,346	\$ 5,425	\$ 2.80	1,929,737	\$ 5,489	\$ 2.84	(4,609)	\$ 64	\$ 0.04	45
46	Feb	1,689,179	\$ 4,241	2.51	1,685,037	\$ 4,245	2.52	(4,142)	5	0.01	46
47	Mar	1,847,149	\$ 4,120	2.23	1,842,308	\$ 4,115	2.23	(4,841)	(5)	0.00	47
48	Apr	1,823,015	\$ 3,298	1.81	1,818,617	\$ 3,346	1.84	(4,398)	48	0.03	48
49	May	2,377,466	\$ 4,121	1.73	2,372,446	\$ 4,182	1.76	(5,020)	61	0.03	49
50	Jun	3,121,162	\$ 7,310	2.34	3,115,750	\$ 7,266	2.33	(5,412)	(44)	(0.01)	50
51	Jul	3,641,857	\$ 9,004	2.47	3,636,012	\$ 8,801	2.42	(5,845)	(203)	(0.05)	51
52	Aug	3,422,076	\$ 8,734	2.55	3,416,209	\$ 8,560	2.51	(5,867)	(174)	(0.05)	52
53	Sep	2,872,407	\$ 6,602	2.30	2,866,973	\$ 6,446	2.25	(5,433)	(156)	(0.05)	53
54	Oct	2,145,099	\$ 5,548	2.59	2,140,380	\$ 5,528	2.58	(4,719)	(20)	(0.00)	54
55	Nov	1,891,900	\$ 4,400	2.33	1,887,627	\$ 4,443	2.35	(4,273)	43	0.03	55
56	Dec	2,093,576	\$ 6,406	3.06	2,089,158	\$ 6,523	3.12	(4,418)	117	0.06	56
58	Total	28,859,232	\$ 69,209	\$ 2.40	28,800,255	\$ 68,945	\$ 2.39	(58,977)	\$ (263)	\$ (0.00)	58
60	3-year Total	80,516,296	\$ 194,844	\$ 2.42	80,398,196	\$ 194,228	\$ 2.42	(118,099)	\$ (616)	\$ 0.01	60
61	Percent of System Loads								0.147%		61
62	Load ratio share of Variable O&M reduction							\$	(1)		62
64	Variable O&M credit (\$/kWh) \$ (0.00001)										64

An additional scenario was also performed to present the impacts to the 2026 Joint IRP Load Forecast of the Companies' proposed preferred plan DSM programs. This scenario removes the current DSM savings and replaces them with those savings identified within the preferred Demand Side Management plan.

The final scenario developed is the 704B Modified load forecast excluding the eligible loads for those Large C&I customers who may decide to exit bundled service and choose service from another provider during the 2027-2029 period. Further detail on this scenario is provided in the next section.

5. NRS Chapter 704B Annual Limits for 2027-2029 Action Plan Period

Pursuant to subsection 6 of NRS 704.741, the Companies are required to include in each triennial joint IRP filing a proposal for annual limits on the total amount of energy and capacity that eligible NRS Chapter 704B customers may be authorized to purchase from providers of new electric resources during the IRP's three-year action plan period. Pursuant to NRS 704.741(2)(a)(1), a load forecast of future retail electric demand must not include the amount of energy and capacity proposed as annual limits on the total amount of energy and capacity that eligible NRS Chapter 704B customers may be authorized to purchase from their providers of new electric resources. The proposal must be a product of a sensitivity analysis that, at a minimum, addresses load growth, import capacity, system constraints and the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limit. Based upon these limits, a customer choosing to exit bundled service during an enrollment period, occurring each January of the three-year action plan period, will file its request in an application with the Commission. This proceeding will determine the final transition period and all fees considered for the customer's exit of bundled service and implementation of its purchase of energy from another provider.

Accordingly, in order to determine the amount of load eligible to purchase energy from other providers for the 2027-2029 Action Plan period, NV Energy created an additional forecast scenario that removes the total MWh sales determined to be eligible (the "704B Modified Load Forecast"). Details on the steps to develop the eligible load limits, and consideration of the sensitivity analyses performed are summarized in Section V of Technical Appendix LF-1.

To determine load growth eligible for the 704B annual limits, the three-year average of historical loads over the 2023-2025 period were considered as the base loads for the calculation of the annual limits. NV Energy anticipates that, over the three-year Action Plan period (January 2025 to December 2027), Large C&I loads will increase by approximately 117,965 MWh (13.47 MW) for Nevada Power and by 2,820,347 MWh (321.96 MW) for Sierra.

Next, reflecting the methodology approved in the 2021 Joint IRP, calculations exclude customers on special pricing tariffs for both Nevada Power and Sierra loads. The resulting loads are subtracted from the historical base load comparison to determine the total eligible load growth. Applying the maximum annual limits prescribed by the proposed regulation, without applying any of the sensitivity analysis factors, yields 58,982 MWh (6.7 MW) total Action Plan period limit for Nevada Power and 1,410,173 MWh (161.0 MW) for Sierra.

The primary limiting adjustment for the eligible load is that there are currently import capacity constraints at Sierra. The company is currently evaluating potential transmission capacity availability at Sierra following the planned in-service date of the SWIP-North Line in mid-2028 as there continues to be zero available capacity even after the Greenlink transmission line goes into service in 2027. While the study may ultimately identify available NV Energy capacity for Sierra, no such capacity has been confirmed at this time. As a result, an existing bundled customer at Sierra cannot exit bundled service during the current 2027–2029 Action Plan period due to existing transmission capacity requests already in the queue. Thus, due to the current import capacity constraints, analysis of this factor places the annual limits for Sierra, for the Action Plan period at zero MW.

As presented in the Table TP-18 in the Transmission Plan Narrative, Nevada Power’s available import capacity is 3,214 MW. In light of this ample open import capacity, NV Energy does not propose to impose any limits on the amount of energy and capacity available to eligible 704B applicants on account of import capacity restrictions for Nevada Power. More information on the import capacity can be found in the Transmission Plan section of the Supply Plan Narrative.

While no further adjustments were made to account for other system constraints in this forecast update, consideration of area-specific limitations may be contemplated in future filings due to the large growth and capacity restraints expected within the local TRIC area in Sierra’s service territory and Apex area in Nevada Power’s service territory.

After consideration of the sensitivity analysis factors, the limit for the 2026 Joint IRP’s three-year Action Plan period for Nevada Power is proposed to be set at 58,982 MWh, which translates into an average hourly load of 6.7 MW. Sierra’s limit remains unchanged at 0 MW, due to continued system import capacity constraints on the system.

The total amount of the Action Plan’s annual limits can be made available in any number of tranche combinations across the three-year period: front-loaded, back-loaded, or broken down equally among each of the Action Plan’s years (E.g., $6.7 \text{ MW} / 3 \text{ years} = 2.23 \text{ MW per year}$).

In the case of eligible customers located in Nevada Power’s service territory purchasing more energy and capacity than authorized by the proposed annual limits, the unreserved MW loads would have to be served in addition to the native load forecasted in this 2026 Joint IRP. Considering Nevada Power’s anticipated peak loads and reserve margin, Nevada Power expects that it will be

- Next, the costs associated with the R-BTER renewable costs and other non-bypassable costs to the annual limits are subtracted from the BTER system impact cost to determine the net BTER cost.
- This adjusted amount is then divided by the energy consumption in kilowatt-hours from the annual limits in the production cost model which derives the Net Differential Energy rate.

The Variable O&M Credit is calculated as the overall difference in variable O&M costs between the base case and the change case. It will be applied on a volumetric basis and reflects the reduction in variable O&M costs related to the exit of the eligible loads from bundled service.

Additionally, NAC 704B.310.8(b) requires the Commission to list any current or ongoing legislatively mandated public policy programs for which eligible customers are required to pay costs, fees, charges, or rates resulting from the process. Those costs, fees, charges, or rates which are not listed will be considered on a case-by-case basis. Accordingly, the list of current legislatively mandated public policy programs from which eligible customers are required to pay costs, fees, charges or rates approved by the Commission in Docket No. 21-06001 are as follows:

- Renewable Energy Program Rate (REPR)
- Temporary Renewable Energy Development Program Rate (TRED)
- Universal Energy Charge (UEC)
- Net Energy Metering
- Energy Efficiency and Conservation Programs (EE)
- Expanded Solar Access Program (ESAP)
- Natural Disaster Protection Plan (NDPP)
- Transportation Electrification Plan
- Economic Recovery Transportation Electrification Plan
- Economic Development Rate Rider; and
- R-BTER.

Section V of the Technical Appendix LF-1 provides information on the development of these rates for the three-year transition period.

The results of the calculations demonstrate that Nevada Power customers choosing to exit the system will pay the Net Differential Energy Rate of \$0.03148 per kWh during their applicable three-year transition period which will be partially offset by the \$-0.00001 per kWh Variable O&M Credit. In addition, such customers will pay other costs required by law including the Base Tariff Energy Rate for the transmission period, and the then-current R-BTER rate (which currently stands at \$0.00463 as filed in Docket No. 26-02013) and will be updated quarterly.

Accordingly, in order to determine the amount of load eligible to purchase energy from other providers for the 2027-2029 action plan period, NV Energy created an additional forecast scenario that removes the total MWh sales determined to be eligible. Based on the analysis, the limit for the three-year action plan period for Nevada Power is proposed to be set at 58,982 MWh annually. Sierra's limit remains unchanged at zero MW, due to continued system import capacity constraints on the system.

The first step, following the methodology approved in the 2021 Joint IRP (Docket No. 21-06001), a three-year average of year-end loads from 2023-2025 are considered as the base loads in order to determine the total load growth eligible for the 704B process. The resulting loads are used to determine the total eligible load growth. NV Energy anticipates that, over the three-year action plan period (January 2027 to December 2029), Large C&I loads are anticipated to increase by 117,965 MWh (13.47 MW) for Nevada Power and by 2,820,347 MWh (321.96 MW) for Sierra. Next, the calculations exclude customers on special pricing tariffs for both Nevada Power and Sierra loads. The resulting loads are subtracted from the historical base load comparison to determine the total eligible load growth. Applying the maximum annual limits prescribed by the proposed regulation, without applying any of the sensitivity analysis factors, yields 58,982 MWh (6.7 MW) total action plan period limit for Nevada Power and 1,410,173 MWh (161.0 MW) for Sierra.

During the 2027-2029 action plan period, severe import capacity constraints are anticipated to continue at Sierra. Currently, Sierra has 681 MW of import transmission service requests placed in a reservation queue for third-party network customers. Sierra is not projected to satisfy this outstanding import capacity need during the action plan period. Greenlink West increases Sierra's import capacity by 725 MW into Northern Nevada, of which 44 MW will be allocated to Sierra's existing 623 MW native load capacity requirements after the 681 MW of network customer reservations are met. In 2029, Greenlink North increases Sierra's import capacity by an additional 800 MW and will provide the remaining 579 MW for native load capacity. The remaining 221 MW will be allocated to native load requirements in 2032. Thus, due to the current import capacity constraints, analysis of this factor places the annual limits for Sierra for the action plan period at zero MW. As shown in the Transmission Plan Narrative in Table TP-18, Nevada Power's available import capacity is 3,214 MW. In light of this ample open import capacity, NV Energy does not propose to impose any limits on the amount of energy and capacity available to eligible 704B applicants on account of import capacity restrictions.

Table LF-61 summarizes the calculation of the amount of load eligible, with the additional considerations that modify the annual limits related to load growth, for Nevada Power. Table LF-62 provides the same information for Sierra.

**TABLE LF-61
NEVADA POWER 704B ELIGIBLE LOAD LIMIT**

Year	Nevada Power		
	Excluded		Total
	Large C&I	Sales	
2023	5,826,823	437,915	5,388,908
2024	6,356,395	618,512	5,737,883
2025	6,383,129	686,931	5,696,198
2026	7,319,105	1,564,075	5,755,030
2027	9,148,708	3,424,236	5,724,472
2028	10,505,965	4,802,846	5,703,119
2029	12,568,915	6,843,287	5,725,628
3-year avg. (2021-2023)	6,188,783	581,119	5,607,663
End of period Load (12/31/2027)	12,568,915	6,843,287	5,725,628
Load Growth			117,965
Eligible load @ 50% of Large C&I sales growth			58,982
Average hourly MWh			6.7
Sensitivity Analysis			
Import Capacity			-
System Constraints			-
Lower 704B Purchases			-
Additional Factors			-
Proposed eligible load			58,982
Average hourly MWh			6.7

**TABLE LF-62
SIERRA PACIFIC 704B ELIGIBLE LOAD LIMIT**

Year	Sierra		
	Large C&I	Excluded Sales	Total
2023	2,683,771	1,170,244	1,513,527
2024	2,810,678	1,325,954	1,484,724
2025	3,002,022	1,491,942	1,510,080
2026	6,799,506	2,542,497	4,257,009
2027	9,560,860	5,287,585	4,273,275
2028	12,973,225	8,643,608	4,329,617
2029	15,758,753	11,435,629	4,323,124
3-year avg. (2021-2023)	2,832,157	1,329,380	1,502,777
End of period Load (12/31/2027)	15,758,753	11,435,629	4,323,124
Load Growth			2,820,347
Eligible load @ 50% of Large C&I sales growth			1,410,173
Average hourly MWh			161.0
Sensitivity Analysis			
Import Capacity			(1,410,173)
System Constraints			-
Lower 704B Purchases			-
Additional Factors			-
Proposed eligible load			-
Average hourly MWh			-

Table LF-63 summarizes the impact of the exit of the proposed annual limits on the base forecast sales and peak MW during the 2027-2029 period for both Nevada Power and Sierra. As previously noted, Sierra's load forecast is not modified due to import capacity constraints.

TABLE LF-63
MODIFIED FORECAST EXCLUDING 704B ANNUAL LIMITS

	2027	2028	2029
<u>Nevada Power</u>			
Total Annual MWh Sales	24,363,758	25,921,380	28,127,362
Eligible Annual Limit MWh Loads	19,661	19,661	19,661
Modified Sales	24,344,097	25,901,719	28,107,701
Annual MW Peak	6,705	6,865	7,369
Coincident MW Peak of Eligible Loads	6.7	6.7	6.7
Modified MW Peak	6,698	6,858	7,362
<u>Sierra</u>			
Total Annual MWh Sales	13,307,068	16,743,505	19,529,589
Eligible Annual Limit MWh Loads	-	-	-
Modified Sales	13,307,068	16,743,505	19,529,589
Annual MW Peak	2,598	2,951	3,242
Coincident MW Peak of Eligible Loads	-	-	-
Modified MW Peak	2,598	2,951	3,242

NV Energy proposes that the annual limits for Nevada Power for the 2027-2029 action plan period be set at the maximum allowable level of 58,982 MWh (approx. 6.7 MW). This total action plan annual limits amount can be made available in any number of tranche combinations: broken down equally among each of the three years (2.23 MW per year), front loaded, or back loaded. To allow the entire limit to leave at the beginning of the period, and to make the calculation of the impact on remaining customers simpler, Nevada Power proposes that the entire annual limits amount (6.7 MW) be available in the first year of the action plan. Considering the above calculations and NV Energy's proposed limit for Nevada Power, the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limits would be negligible.¹⁰

In the case of eligible customers located in Nevada Power's service territory purchasing less energy and capacity than authorized by the proposed annual limits, the maximum MW loads would have to be served in addition to the native load forecasted in this 2026 Joint IRP. Considering Nevada Power's anticipated peak loads and reserve margin, Nevada Power expects that it will be able to serve the additional load with minimal effect on rates paid by its customers and no effect on the

¹⁰ As provided for in the proposed regulations, if the proposed annual limit is not fully used in the first year of the action plan, the unused amount will be carried forward to the second and/or third years of the action plan.

The Variable O&M credit is calculated as the overall difference in variable O&M costs between the base case and the change case. It will be applied on a volumetric basis and reflects the reduction in variable O&M costs related to the exit of the eligible loads from bundled service.

Additionally, Section 12 of the proposed regulation submitted to the Legislative Counsel Bureau ("LCB") in Docket No. 19-06029 requires the Commission to list any current or ongoing legislatively mandated public policy programs for which eligible customers are required to pay costs, fees, charges, or rates pursuant to subsection 8 of NRS 704B.310. Those costs, fees, charges or rates which are not listed will be considered on a case-by-case basis. Accordingly, the list of current legislatively mandated public policy programs from which eligible customers are required to pay costs, fees, charges or rates approved by the Commission in Docket No. 21-06001 are as follows:

- Renewable Energy Program Rate (REPR)
- Temporary Renewable Energy Development Program Rate (TRED)
- Universal Energy Charge (UEC)
- Net Energy Metering
- Energy Efficiency and Conservation Programs (EE)
- Expanded Solar Access Program (ESAP)
- Natural Disaster Protection Plan (NDPP)
- Transportation Electrification Plan
- Economic Recovery Transportation Electrification Plan
- Economic Development Rate Rider; and
- R-BTER.

In conclusion, the results of the calculations in this proceeding demonstrate that Nevada Power customers choosing to exit the system will pay the Net Differential Energy Rate of \$0.03148 per kWh during their applicable three-year transition period which will be partially offset by the \$-0.00001 per kWh variable O&M costs credit. In addition, such customers will pay other costs required by law including the Base Tariff Energy Rate for the transmission period and the then-current R-BTER rate (which currently stands at \$0.00463 as filed in Docket No. 26-02013) and will be updated quarterly.

**EXHIBIT A -
REDLINE VERSION**

Brooks 138/12 kV transformer	2030	Nevada Power	Las Vegas	\$	25,000	Add 138/12 kV 33 MVA transformers, construct 12 kV get aways
Coyote Creek-Falcon 345 kV line	2030	Sierra	Valmy	\$	66,000	Construct new Coyote Creek - Falcon 345 kV line, reconfigure high and low side bus of Falcon substation
Olinghouse-Chukar 345 kV line	2030	Sierra	TRIC	\$	38,000	Construct new Olinghouse-Chukar 345 kV line
Robinson Summit third 345 kV PST and third 525/345 kV transformer	2030	Sierra	Ely	\$	55,000	Add third 345 kV PST and third 525/345 kV transformers at Robinson Summit substation
Esmeralda-Millers 230 kV line	2030	Sierra	Tonopah	\$	120,000	Construct new Esmeralda-Millers 230 kV line, reconstruct Millers to accommodate 230/120 kV 150 MVA transformer
Interconnection of Big Smokey lead line at Millers	2030	Sierra	Tonopah	\$	20,000	Reconstruct Millers to accommodate new generator lead line
Wassuk lead line for Mason	2030	Sierra	Yerington	\$	2,000	Add 120 kV line terminal at Wassuk substation
Candelaria 120 kV switching station	2030	Sierra	Yerington	\$	30,000	New Candelaria switching station with 120 kV lead line position for Excelsior Geothermal project
#124 line clearance mitigations	2030	Sierra	Yerington	\$	500	Replace five (5) structures to increase line clearances
Walker River 120 kV line terminal	2028	Sierra	Yerington	\$	6,300	Construct 120 kV line terminal position for generator lead line
Walker River 345/230 kV transformer #3	2030	Sierra	Yerington	\$	25,000	Add third 345/120 kV transformer at Walker River
Walker River 230 kV line terminal	2030	Sierra	Yerington	\$	3,000	Construct 230 kV line terminal position for generator lead line
Walker River 345 kV line terminal	2030	Sierra	Yerington	\$	3,000	Construct 345 kV line terminal position for generator lead line
Miller 138 kV line terminal	2030	Nevada Power	Las Vegas	\$	600	Construct 138 kV line terminal position for generator lead line
Crystal 525 kV line terminal	2030	Nevada Power	Las Vegas	\$	5,870	Construct 500 kV line terminal position for generator lead line
Gonder 345 kV line Terminal	2028	Sierra	Austin	\$	~~\$9,445~~ 1,800	Construct 345 kV line terminal position for generator lead line
Gonder generator run back RAS	2028	Sierra	Austin	\$	1,100	Construct generator run back RAS, loss Gonder 345 kV connection to Robinson Summit

36. Q. **HOW ARE THE ANNUAL LIMITS FOR THE ACTION PLAN PERIOD DETERMINED?**

A. Following the methodology approved in the 2021 Joint IRP, in this proceeding the Large C&I year-end sales growth over the three-year Action Plan Period, January 1, 2027, through December 31, 2029, is calculated as the difference in the year-end sales for 2029 minus the three-year average of actual annual Large C&I loads during the 2023–2025 period. Thus, the difference between the load at the end of 2029 yields the Action Plan Period load growth under normal economic conditions.

Similar to previous IRP calculations, in addition to this base year load calculation, loads for individual customers on tariff schedules with non-standard, fully-bundled price options (e.g. GS-4 New Generation – GS-4-NG, Large Customer Market Price Energy – LCMPE, Market Price Energy – MPE, or the Economic Development Rate Rider – EDRR tariffs) were excluded from the load growth calculations for both utilities. This adjusted difference in load is then reduced by 50 percent to reflect the requirement that the eligible loads are offset by future expected growth in Large C&I customer sales.

37. Q. **WHAT ARE THE RESULTING LOAD LEVELS ELIGIBLE TO LEAVE BUNDLED SERVICE UNDER 704B FOR THE CURRENT THREE-YEAR ACTION PLAN PERIOD?**

A. As detailed in Section 6 of the Load Forecast Narrative and Section IV of Technical Appendix LF-1, the proposed eligible loads, which represent annual limits for the entire Action Plan Period as summarized below in Table Pollard-Direct-10, are ~~58,133~~58,982 MWh for Nevada Power. Due to the lack of import capacity at Sierra, the limit for Sierra has been set to zero MWh in this proceeding. The required non-

load growth factors that determine the eligible annual limits, as identified in both NRS 704.741(6) (i.e., “import capacity, system constraints, and the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limit”) and applicable regulations, were considered for both utilities, but only have an impact on the proposed limits for Sierra (due to lack of import capacity).^{6, 7}

**TABLE POLLARD-DIRECT-10
704B ELIGIBLE LOADS**

	2027	2028	2029
<u>Nevada Power</u>			
Total Annual MWh Sales	24,363,758	25,921,380	28,127,362
Eligible Annual Limit MWh Loads	19,378	19,378	19,378
Modified Sales	24,344,380	25,902,002	28,107,984
Annual MW Peak	6,705	6,865	7,369
Coincident MW Peak of Eligible Loads	6.6	6.6	6.6
Modified MW Peak	6,698	6,858	7,362
<u>Sierra</u>			
Total Annual MWh Sales	13,307,068	16,743,505	19,529,589
Eligible Annual Limit MWh Loads	-	-	-
Modified Sales	13,307,068	16,743,505	19,529,589
Annual MW Peak	2,598	2,951	3,242
Coincident MW Peak of Eligible Loads	-	-	-
Modified MW Peak	2,598	2,951	3,242

TABLE PRODUCED AS ORIGINAL WITHOUT REDLINES

⁶ NRS 704.741(6) (“The Commission shall require the utility or utilities to include in the plan a proposal for annual limits.... In developing the proposal and the forecasts in the plan, the utility or utilities must use a sensitivity analysis that, at a minimum, addresses load growth, import capacity, system constraints and the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limit....”)

⁷ NAC does not specifically address NRS 704.741(6) nor set the specific 704B exit limits, but NAC 704.9061 on the Energy Supply Plan (ESP) and NAC 704.9156 on the Resource Plan (IRP), among other sections pertinent to ESP and IRP, address how action plans identify planned resources and transmission needs, which inform 704B implementation. NRS 704B.310(2) (Commission must find no adverse effect on reliability) and NRS 704B.325 (approval criteria and conditions) support NRS 704.741(6).

a rate for the Base Tariff Energy Rate net of out-of-the-money power purchase agreements costs (“Net Differential Energy Rate”) for a three-year transition period. In addition, the incremental Renewable BTER (“R-BTER”) rate and other public policy program rates shall be included on an ongoing basis for these customers’ bills. Further, any applicable additional costs related to decommissioning and remediation costs and regulatory asset charges must be imposed by the Commission on customers choosing to exit bundled service to begin taking service from a third-party energy provider.

42. Q. WHAT ARE THE PROPOSED ENERGY RELATED CHARGES PROPOSED IN THIS PROCEEDING?

A. **Exhibit Pollard-Direct-3** presents the proposed 704B rates for the 2026 Joint IRP three-year action plan period. Pursuant to subsection 1 of Section 2 of the implementing regulation, the Net Differential Energy Rate and the credit/charge for variable operations and maintenance (“O&M”) costs is determined in a triennial resource plan and is held constant for the duration of the corresponding three-year transition period.¹²

The results of the calculations demonstrate that Nevada Power customers choosing to exit the system will pay the Net Differential Energy Rate of ~~\$0.03144~~0.03148 per kWh during their applicable three-year transition period which will be partially offset by the \$-0.00001 per kWh variable O&M costs credit. In addition, such customers will pay other costs required by law including the Base Tariff Energy Rate for the transmission period and the then-current R-BTER rate (which currently stands at \$0.00463 as filed in Docket No. 26-02013) and will be updated quarterly. The total effective BTER neutrality charge will be ~~\$0.03606~~0.03610 per kWh.

¹² LCB File No. R195-22.

Nevada Power Company

704B Rate Summary

2026 Joint IRP

Docket No. 26-05

Exhibit Pollard Direct-3

Page 1 of 3

Line No.	Rate	Value	Notes	Source	Line No.
8	Fuel & Purchased Power (BTER) Charges				8
9	R-BTER	\$ 0.00463	Current R-BTER	Docket No. 26-05	9
10	Net BTER	\$ ~~0.03144~~ 0.03148	Calculations on pg. 2	PLEXOUT	10
11	Variable O&M Credit	\$ (0.00001)	Calculations on pg. 3	PLEXOUT	11
12					12
13	Public Policy Rates	(1)	As applicable	Statement of Rates	13
14	Decommissioning and Remediation Charges	As applicable	As applicable		14
15	Regulatory Asset Charges	As applicable	As applicable		15
16	1) Eligible customers will pay public policy program rates of the applicable schedule as detailed on the current Statement of Rates.				16
17					17
18					18
19	Action Period MWh Eligible for 704B Process	~~116,399~~ 118,099			19
20	Revenue Neutrality BTER Charges	\$ ~~4,197,857~~ 4,263,902			20
21	Effective BTER neutrality charge per MWh	\$ ~~36.06~~ 36.10			21
22					22

large-load customers if the Commission determines that another proceeding (e.g., a tariff filing) is necessary to refine processes and procedures needed to implement the LLESA.

23. Q. IS THE LLESA SUFFICIENT TO SECURE THE VISION OF THE RESPONSIBLE SPEED TO POWER PLAN?

A. No. As Ms. Wells explains, NV Energy faces a step change in large-load service requests. Based on NV Energy's understanding of the state of data center development in northern and southern Nevada, a Responsible Speed to Power Plan would need to address how to serve at least another 2 GW of data center load by 2036 but could include well over that amount of additional data center load. To deliver the Responsible Speed to Power Plan, which effectively is another step change of investment in distribution, transmission, generation and energy resources, NV Energy needs additional assurances from data center customers.

First, the current nine LLESA customers alone will substantially change NV Energy's business, even if those customers only reach minimum demand and minimum energy levels consistent with the LLESA's proposed by NV Energy.²⁸ By 2036, at minimum load levels, the LLESA customers and legacy data centers will constitute 58.459-0 percent of Sierra's volumetric sales, almost all of which will come from four data centers. *See* Figure SME-Rebuttal-1, below.

²⁸ Docket Nos. 26-05026 through 26-05030.

PRODUCED AS ORIGINAL
WITHOUT REDLINES

Line	Step	Description	2025-2027 period average												Total	
			January	February	March	April	May	June	July	August	September	October	November	December		
8	BTER Impact														8	
9															9	
10		Base Case System Information													10	
11		Base Case System Requirements	5,394,699	4,747,664	5,092,627	5,028,195	6,653,171	8,841,992	10,344,128	9,684,165	8,026,136	5,835,770	5,138,152	5,729,595	80,516,296	11
12		System Fuel & Purchased Power Cost	258,545	208,353	168,422	152,439	203,455	309,600	411,772	387,868	281,739	188,196	180,293	256,511	3,007,193	12
13		Average System Cost (\$/MWh)	47.93	43.89	33.07	30.32	30.58	35.01	39.81	40.05	35.10	32.25	35.09	44.77	37.35	13
14															14	
15		Change Case System Information													15	
16		Change Case System Requirements	5,385,621	4,739,354	5,083,084	5,019,525	6,643,282	8,831,322	10,332,610	9,672,600	8,015,417	5,826,473	5,129,721	5,720,887	80,399,897	16
17		System Fuel & Purchased Power Cost	258,579	208,765	168,464	152,305	203,358	309,231	411,040	387,118	281,172	188,849	180,393	257,056	3,006,330	17
18		Average System Cost (\$/MWh)	48.01	44.05	33.14	30.34	30.61	35.02	39.78	40.02	35.08	32.41	35.17	44.93	37.39	18
19															19	
20		Fuel & Purchased Power Cost Changes	\$ 34	\$ 411	\$ 42	\$ (134)	\$ (97)	\$ (370)	\$ (732)	\$ (750)	\$ (567)	\$ 653	\$ 100	\$ 545	\$ (863)	20
21		\$/MWh Change in Cost	\$ 0.01	\$ 0.09	\$ 0.01	\$ (0.03)	\$ (0.01)	\$ (0.04)	\$ (0.07)	\$ (0.08)	\$ (0.07)	\$ 0.11	\$ 0.02	\$ 0.10	\$ (0.01)	21
22														22		
23	Eligible MWh Load	9,078	8,310	9,543	8,671	9,890	10,670	11,518	11,565	10,719	9,297	8,432	8,708	116,399	23	
24	1 Eligible MWh Load BTER Impact Fee ¹	\$ 433	\$ 364	\$ 314	\$ 262	\$ 301	\$ 372	\$ 456	\$ 460	\$ 374	\$ 300	\$ 295	\$ 389	\$ 4,320	24	
25														25		
26	R-BTER Adjustment													26		
27	Renewable Energy													27		
28	Renewable Energy Generation (MWh)	589,882	547,114	649,409	651,832	655,440	601,726	552,149	564,966	541,904	568,909	547,582	587,444	7,058,357	28	
29	Renewable Contract Energy Cost	55,412	51,066	59,944	60,470	59,979	54,558	50,347	51,893	49,404	52,578	51,342	55,729	652,720	29	
30	Average Renewables Cost	\$ 93.94	\$ 93.34	\$ 92.31	\$ 92.77	\$ 91.51	\$ 90.67	\$ 91.18	\$ 91.85	\$ 91.17	\$ 92.42	\$ 93.76	\$ 94.87	\$ 92.47	30	
31														31		
32	Non-Renewables System Information													32		
33	System Requirements	4,804,817	4,200,551	4,443,218	4,376,363	5,997,732	8,240,266	9,791,979	9,119,199	7,484,232	5,266,861	4,590,570	5,142,151	73,457,938	33	
34	Total System Cost (exc. Renewables)	\$ 203,133	\$ 157,287	\$ 108,478	\$ 91,969	\$ 143,476	\$ 255,043	\$ 361,425	\$ 335,975	\$ 232,334	\$ 135,618	\$ 128,951	\$ 200,782	\$ 2,354,473	34	
35	Average Non-Renewable System Cost	\$ 42.28	\$ 37.44	\$ 24.41	\$ 21.01	\$ 23.92	\$ 30.95	\$ 36.91	\$ 36.84	\$ 31.04	\$ 25.75	\$ 28.09	\$ 39.05	\$ 32.05	35	
36														36		
37	2b-c Renewable Energy @ Ave. System Cost	\$ 24,938	\$ 20,486	\$ 15,855	\$ 13,698	\$ 15,679	\$ 18,624	\$ 20,380	\$ 20,815	\$ 16,822	\$ 14,649	\$ 15,382	\$ 22,938	\$ 220,267	37	
38	2d R-BTER Cost	\$ 30,473	\$ 30,579	\$ 44,089	\$ 46,771	\$ 44,300	\$ 35,934	\$ 29,967	\$ 31,078	\$ 32,582	\$ 37,929	\$ 35,960	\$ 32,791	\$ 432,453	38	
39														39		
40	Eligible Exiting Load	9,078	8,310	9,543	8,671	9,890	10,670	11,518	11,565	10,719	9,297	8,432	8,708	116,399	40	
41	Percent of System Loads	0.168%	0.175%	0.187%	0.172%	0.149%	0.121%	0.111%	0.119%	0.134%	0.159%	0.164%	0.152%	0.145%	41	
42														42		
43	3 R-BTER costs allocated to Eligible Load	\$ 51	\$ 54	\$ 83	\$ 81	\$ 66	\$ 43	\$ 33	\$ 37	\$ 44	\$ 60	\$ 59	\$ 50	\$ 661	43	
44														44		
45	Net BTER Rate Impact													45		
46	4 Cost Difference w/ R-BTER Adjustment	\$ 382	\$ 310	\$ 232	\$ 181	\$ 235	\$ 328	\$ 423	\$ 423	\$ 331	\$ 239	\$ 236	\$ 339	\$ 3,660	46	
47	5 Net-BTER rate	\$ 0.04210	\$ 0.03736	\$ 0.02429	\$ 0.02087	\$ 0.02379	\$ 0.03077	\$ 0.03668	\$ 0.03661	\$ 0.03084	\$ 0.02574	\$ 0.02797	\$ 0.03897	\$ 0.03144	47	
48														48		
49	Notes:													49		
50	1) Adjusted for Mill Tax (0.3891035%)													50		
Net-BTER Rate														\$ 0.03144		

Line	Base Case				Change Case				Difference				Line
No.		MWh	Costs (\$000)	\$/MWh	MWh	Costs (\$000)	\$/MWh	MWh	Costs (\$000)	\$/MWh		No.	
9												9	
10	2027											10	
11	Jan	1,673,534	\$ 3,878	\$ 2.32	1,673,534	\$ 3,867	\$ 2.31	0	\$ (11)	\$ (0.01)		11	
12	Feb	1,449,711	\$ 3,386	\$ 2.34	1,449,711	\$ 3,392	2.34	0	6	0.00		12	
13	Mar	1,563,972	\$ 3,394	\$ 2.17	1,563,972	\$ 3,391	2.17	0	(3)	(0.00)		13	
14	Apr	1,537,462	\$ 2,450	\$ 1.59	1,537,462	\$ 2,453	1.60	0	3	0.00		14	
15	May	2,062,063	\$ 3,395	\$ 1.65	2,062,063	\$ 3,384	1.64	0	(11)	(0.01)		15	
16	Jun	2,778,168	\$ 7,799	\$ 2.81	2,778,168	\$ 7,846	2.82	0	47	0.02		16	
17	Jul	3,278,823	\$ 10,756	\$ 3.28	3,278,823	\$ 10,775	3.29	0	19	0.01		17	
18	Aug	3,061,252	\$ 10,120	\$ 3.31	3,061,252	\$ 10,016	3.27	0	(104)	(0.03)		18	
19	Sep	2,517,256	\$ 6,914	\$ 2.75	2,517,256	\$ 6,841	2.72	0	(72)	(0.03)		19	
20	Oct	1,789,913	\$ 3,912	\$ 2.19	1,789,913	\$ 3,922	2.19	0	10	0.01		20	
21	Nov	1,563,974	\$ 3,751	\$ 2.40	1,563,974	\$ 3,765	2.41	0	14	0.01		21	
22	Dec	1,761,405	\$ 4,079	\$ 2.32	1,761,405	\$ 4,078	2.32	0	(1)	(0.00)		22	
23												23	
24	Total	25,037,533	\$ 63,833	\$ 2.55	25,037,533	\$ 63,730	\$ 2.55	0	\$ (104)	\$ (0.00)		24	
25												25	
26												26	
27	2028											27	
28	Jan	1,786,819	\$ 4,408	\$ 2.47	1,782,284	\$ 4,346	\$ 2.44	(4,535)	\$ (62)	\$ (0.03)		28	
29	Feb	1,608,775	\$ 3,824	2.38	1,604,547	\$ 3,885	2.42	(4,228)	61	0.04		29	
30	Mar	1,681,506	\$ 3,647	2.17	1,676,734	\$ 3,645	2.17	(4,771)	(2)	0.01		30	
31	Apr	1,667,718	\$ 2,884	1.73	1,663,382	\$ 2,907	1.75	(4,336)	23	0.02		31	
32	May	2,213,642	\$ 3,610	1.63	2,208,701	\$ 3,619	1.64	(4,942)	9	0.01		32	
33	Jun	2,942,663	\$ 7,343	2.50	2,937,327	\$ 7,357	2.50	(5,336)	14	0.01		33	
34	Jul	3,423,447	\$ 9,160	2.68	3,417,690	\$ 9,036	2.64	(5,757)	(124)	(0.03)		34	
35	Aug	3,200,837	\$ 8,086	2.53	3,195,055	\$ 7,958	2.49	(5,782)	(129)	(0.04)		35	
36	Sep	2,636,473	\$ 6,072	2.30	2,631,109	\$ 6,060	2.30	(5,364)	(12)	0.00		36	
37	Oct	1,900,758	\$ 4,329	2.28	1,896,112	\$ 4,320	2.28	(4,646)	(9)	0.00		37	
38	Nov	1,682,278	\$ 3,938	2.34	1,678,058	\$ 3,925	2.34	(4,220)	(13)	(0.00)		38	
39	Dec	1,874,614	\$ 4,501	2.40	1,870,260	\$ 4,522	2.42	(4,354)	21	0.02		39	
40												40	
41	Total	26,619,531	\$ 61,802	\$ 2.32	26,561,259	\$ 61,579	\$ 2.32	(58,271)	\$ (224)	\$ (0.00)		41	
42												42	
43												43	
44	2029											44	
45	Jan	1,934,346	\$ 5,425	\$ 2.80	1,929,803	\$ 5,511	\$ 2.86	(4,543)	\$ 85	\$ 0.05		45	
46	Feb	1,689,179	\$ 4,241	2.51	1,685,096	\$ 4,249	2.52	(4,082)	8	0.01		46	
47	Mar	1,847,149	\$ 4,120	2.23	1,842,378	\$ 4,133	2.24	(4,771)	14	0.01		47	
48	Apr	1,823,015	\$ 3,298	1.81	1,818,680	\$ 3,295	1.81	(4,335)	(3)	0.00		48	
49	May	2,377,466	\$ 4,121	1.73	2,372,518	\$ 4,104	1.73	(4,948)	(17)	(0.00)		49	
50	Jun	3,121,162	\$ 7,310	2.34	3,115,828	\$ 7,203	2.31	(5,334)	(107)	(0.03)		50	
51	Jul	3,641,857	\$ 9,004	2.47	3,636,096	\$ 8,932	2.46	(5,761)	(72)	(0.02)		51	
52	Aug	3,422,076	\$ 8,734	2.55	3,416,294	\$ 8,637	2.53	(5,782)	(97)	(0.02)		52	
53	Sep	2,872,407	\$ 6,602	2.30	2,867,052	\$ 6,389	2.23	(5,355)	(213)	(0.07)		53	
54	Oct	2,145,099	\$ 5,548	2.59	2,140,448	\$ 5,644	2.64	(4,651)	97	0.05		54	
55	Nov	1,891,900	\$ 4,400	2.33	1,887,689	\$ 4,478	2.37	(4,211)	78	0.05		55	
56	Dec	2,093,576	\$ 6,406	3.06	2,089,222	\$ 6,557	3.14	(4,354)	151	0.08		56	
57												57	
58	Total	28,859,232	\$ 69,209	\$ 2.40	28,801,105	\$ 69,133	\$ 2.40	(58,128)	\$ (76)	\$ 0.00		58	
59												59	
60	3-year Total	80,516,296	\$ 194,844	\$ 2.42	80,399,897	\$ 194,441	\$ 2.42	(116,399)	\$ (403)	\$ 0.00		60	
61	Percent of System Loads								0.145%			61	
62	Load ratio share of Variable O&M reduction							\$	(1)			62	
63												63	
64								Variable O&M credit (\$/kWh)	\$	(0.00001)		64	
65												65	

An additional scenario was also performed to present the impacts to the 2026 Joint IRP Load Forecast of the Companies' proposed preferred plan DSM programs. This scenario removes the current DSM savings and replaces them with those savings identified within the preferred Demand Side Management plan.

The final scenario developed is the 704B Modified load forecast excluding the eligible loads for those Large C&I customers who may decide to exit bundled service and choose service from another provider during the 2027-2029 period. Further detail on this scenario is provided in the next section.

5. NRS Chapter 704B Annual Limits for 2027-2029 Action Plan Period

Pursuant to subsection 6 of NRS 704.741, the Companies are required to include in each triennial joint IRP filing a proposal for annual limits on the total amount of energy and capacity that eligible NRS Chapter 704B customers may be authorized to purchase from providers of new electric resources during the IRP's three-year action plan period. Pursuant to NRS 704.741(2)(a)(1), a load forecast of future retail electric demand must not include the amount of energy and capacity proposed as annual limits on the total amount of energy and capacity that eligible NRS Chapter 704B customers may be authorized to purchase from their providers of new electric resources. The proposal must be a product of a sensitivity analysis that, at a minimum, addresses load growth, import capacity, system constraints and the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limit. Based upon these limits, a customer choosing to exit bundled service during an enrollment period, occurring each January of the three-year action plan period, will file its request in an application with the Commission. This proceeding will determine the final transition period and all fees considered for the customer's exit of bundled service and implementation of its purchase of energy from another provider.

Accordingly, in order to determine the amount of load eligible to purchase energy from other providers for the 2027-2029 Action Plan period, NV Energy created an additional forecast scenario that removes the total MWh sales determined to be eligible (the "704B Modified Load Forecast"). Details on the steps to develop the eligible load limits, and consideration of the sensitivity analyses performed are summarized in Section V of Technical Appendix LF-1.

To determine load growth eligible for the 704B annual limits, the three-year average of historical loads over the 2023-2025 period were considered as the base loads for the calculation of the annual limits. NV Energy anticipates that, over the three-year Action Plan period (January 2025 to December 2027), Large C&I loads will increase by approximately ~~116,267~~117,965 MWh (~~12.3~~13.47 MW) for Nevada Power and by ~~1,323,669~~2,820,347 MWh (~~151.1~~1321.96 MW) for Sierra.

Next, reflecting the methodology approved in the 2021 Joint IRP, calculations exclude customers on special pricing tariffs for both Nevada Power and Sierra loads. The resulting loads are subtracted from the historical base load comparison to determine the total eligible load growth. Applying the maximum annual limits prescribed by the proposed regulation, without applying any of the sensitivity analysis factors, yields ~~58,133~~58,982 MWh (~~6.66.7~~ MW) total Action Plan period limit for Nevada Power and ~~661,834~~1,410,173 MWh (~~75.6~~161.0 MW) for Sierra.

The primary limiting adjustment for the eligible load is that there are currently import capacity constraints at Sierra. The company is currently evaluating potential transmission capacity availability at Sierra following the planned in-service date of the SWIP-North Line in mid-2028 as there continues to be zero available capacity even after the Greenlink transmission line goes into service in 2027. While the study may ultimately identify available NV Energy capacity for Sierra, no such capacity has been confirmed at this time. As a result, an existing bundled customer at Sierra cannot exit bundled service during the current 2027–2029 Action Plan period due to existing transmission capacity requests already in the queue. Thus, due to the current import capacity constraints, analysis of this factor places the annual limits for Sierra, for the Action Plan period at zero MW.

As presented in the Table TP-18 in the Transmission Plan Narrative, Nevada Power’s available import capacity is 3,214 MW. In light of this ample open import capacity, NV Energy does not propose to impose any limits on the amount of energy and capacity available to eligible 704B applicants on account of import capacity restrictions for Nevada Power. More information on the import capacity can be found in the Transmission Plan section of the Supply Plan Narrative.

While no further adjustments were made to account for other system constraints in this forecast update, consideration of area-specific limitations may be contemplated in future filings due to the large growth and capacity restraints expected within the local TRIC area in Sierra’s service territory and Apex area in Nevada Power’s service territory.

After consideration of the sensitivity analysis factors, the limit for the 2026 Joint IRP’s three-year Action Plan period for Nevada Power is proposed to be set at ~~58,133~~58,982 MWh, which translates into an average hourly load of ~~6.66.7~~ MW. Sierra’s limit remains unchanged at 0 MW, due to continued system import capacity constraints on the system.

The total amount of the Action Plan’s annual limits can be made available in any number of tranche combinations across the three-year period: front-loaded, back-loaded, or broken down equally among each of the Action Plan’s years (E.g., ~~6.66.7~~ MW / 3 years = ~~2.22.23~~ MW per year).

In the case of eligible customers located in Nevada Power’s service territory purchasing more energy and capacity than authorized by the proposed annual limits, the unreserved MW loads would have to be served in addition to the native load forecasted in this 2026 Joint IRP. Considering Nevada Power’s anticipated peak loads and reserve margin, Nevada Power expects that it will be

- Next, the costs associated with the R-BTER renewable costs and other non-bypassable costs to the annual limits are subtracted from the BTER system impact cost to determine the net BTER cost.
- This adjusted amount is then divided by the energy consumption in kilowatt-hours from the annual limits in the production cost model which derives the Net Differential Energy rate.

The Variable O&M Credit is calculated as the overall difference in variable O&M costs between the base case and the change case. It will be applied on a volumetric basis and reflects the reduction in variable O&M costs related to the exit of the eligible loads from bundled service.

Additionally, NAC 704B.310.8(b) requires the Commission to list any current or ongoing legislatively mandated public policy programs for which eligible customers are required to pay costs, fees, charges, or rates resulting from the process. Those costs, fees, charges, or rates which are not listed will be considered on a case-by-case basis. Accordingly, the list of current legislatively mandated public policy programs from which eligible customers are required to pay costs, fees, charges or rates approved by the Commission in Docket No. 21-06001 are as follows:

- Renewable Energy Program Rate (REPR)
- Temporary Renewable Energy Development Program Rate (TRED)
- Universal Energy Charge (UEC)
- Net Energy Metering
- Energy Efficiency and Conservation Programs (EE)
- Expanded Solar Access Program (ESAP)
- Natural Disaster Protection Plan (NDPP)
- Transportation Electrification Plan
- Economic Recovery Transportation Electrification Plan
- Economic Development Rate Rider; and
- R-BTER.

Section V of the Technical Appendix LF-1 provides information on the development of these rates for the three-year transition period.

The results of the calculations demonstrate that Nevada Power customers choosing to exit the system will pay the Net Differential Energy Rate of ~~\$0.03144~~0.03148 per kWh during their applicable three-year transition period which will be partially offset by the \$-0.00001 per kWh Variable O&M Credit. In addition, such customers will pay other costs required by law including the Base Tariff Energy Rate for the transmission period, and the then-current R-BTER rate (which currently stands at \$0.00463 as filed in Docket No. 26-02013) and will be updated quarterly.

Accordingly, in order to determine the amount of load eligible to purchase energy from other providers for the 2027-2029 action plan period, NV Energy created an additional forecast scenario that removes the total MWh sales determined to be eligible. Based on the analysis, the limit for the three-year action plan period for Nevada Power is proposed to be set at ~~58,133~~58,982 MWh annually. Sierra's limit remains unchanged at zero MW, due to continued system import capacity constraints on the system.

The first step, following the methodology approved in the 2021 Joint IRP (Docket No. 21-06001), a three-year average of year-end loads from 2023-2025 are considered as the base loads in order to determine the total load growth eligible for the 704B process. The resulting loads are used to determine the total eligible load growth. NV Energy anticipates that, over the three-year action plan period (January 2027 to December 2029), Large C&I loads are anticipated to increase by ~~116,267~~117,965 MWh (~~12,313.47~~ MW) for Nevada Power and by ~~1,323,669~~2,820,347 MWh (~~151,132~~1,961.96 MW) for Sierra. Next, the calculations exclude customers on special pricing tariffs for both Nevada Power and Sierra loads. The resulting loads are subtracted from the historical base load comparison to determine the total eligible load growth. Applying the maximum annual limits prescribed by the proposed regulation, without applying any of the sensitivity analysis factors, yields ~~58,133~~58,982 MWh (~~6.66~~7 MW) total action plan period limit for Nevada Power and ~~661,834~~1,410,173 MWh (~~75.61~~161.0 MW) for Sierra.

During the 2027-2029 action plan period, severe import capacity constraints are anticipated to continue at Sierra. Currently, Sierra has 681 MW of import transmission service requests placed in a reservation queue for third-party network customers. Sierra is not projected to satisfy this outstanding import capacity need during the action plan period. Greenlink West increases Sierra's import capacity by 725 MW into Northern Nevada, of which 44 MW will be allocated to Sierra's existing 623 MW native load capacity requirements after the 681 MW of network customer reservations are met. In 2029, Greenlink North increases Sierra's import capacity by an additional 800 MW and will provide the remaining 579 MW for native load capacity. The remaining 221 MW will be allocated to native load requirements in 2032. Thus, due to the current import capacity constraints, analysis of this factor places the annual limits for Sierra for the action plan period at zero MW. As shown in the Transmission Plan Narrative in Table TP-18, Nevada Power's available import capacity is 3,214 MW. In light of this ample open import capacity, NV Energy does not propose to impose any limits on the amount of energy and capacity available to eligible 704B applicants on account of import capacity restrictions.

Table LF-61 summarizes the calculation of the amount of load eligible, with the additional considerations that modify the annual limits related to load growth, for Nevada Power. Table LF-62 provides the same information for Sierra.

**TABLE LF-61
NEVADA POWER 704B ELIGIBLE LOAD LIMIT**

Year	Nevada Power		
	Large C&I	Excluded Sales	Total
2023	5,826,823	439,809	5,387,014
2024	6,356,395	623,160	5,733,235
2025	6,383,129	692,749	5,690,381
2026	7,319,105	1,569,893	5,749,212
2027	9,148,708	3,430,054	5,718,654
2028	10,505,965	4,808,664	5,697,301
2029	12,568,915	6,849,105	5,719,810
3-year avg. (2021-2023)	6,188,783	585,239	5,603,543
End of period Load (12/31/2027)	12,568,915	6,849,105	5,719,810
Load Growth			116,267
Eligible load @ 50% of Large C&I sales growth			58,133
Average hourly MWh			6.6
Sensitivity Analysis			
Import Capacity			-
System Constraints			-
Lower 704B Purchases			-
Additional Factors			-
Proposed eligible load			58,133
Average hourly MWh			6.6

TABLE PRODUCED AS ORIGINAL WITHOUT REDLINES

**TABLE LF-62
SIERRA PACIFIC 704B ELIGIBLE LOAD LIMIT**

Year	Sierra		
	Large C&I	Excluded Sales	Total
2023	2,683,771	98,521	2,585,250
2024	2,810,678	272,001	2,538,677
2025	3,002,022	447,281	2,554,740
2026	6,799,506	2,982,396	3,817,110
2027	9,560,860	5,727,484	3,833,376
2028	12,973,225	9,083,507	3,889,718
2029	15,758,753	11,875,528	3,883,225
3-year avg. (2021-2023)	2,832,157	272,601	2,559,556
End of period Load (12/31/2027)	15,758,753	11,875,528	3,883,225
Load Growth			1,323,669
Eligible load @ 50% of Large C&I sales growth			661,834
Average hourly MWh			75.6
Sensitivity Analysis			
Import Capacity			(661,834)
System Constraints			-
Lower 704B Purchases			-
Additional Factors			-
Proposed eligible load			-
Average hourly MWh			-

TABLE PRODUCED AS ORIGINAL WITHOUT REDLINES

Table LF-63 summarizes the impact of the exit of the proposed annual limits on the base forecast sales and peak MW during the 2027-2029 period for both Nevada Power and Sierra. As previously noted, Sierra's load forecast is not modified due to import capacity constraints.

**TABLE LF-63
MODIFIED FORECAST EXCLUDING 704B ANNUAL LIMITS**

	2027	2028	2029
<u>Nevada Power</u>			
Total Annual MWh Sales	24,363,758	25,921,380	28,127,362
Eligible Annual Limit MWh Loads	19,378	19,378	19,378
Modified Sales	24,344,380	25,902,002	28,107,984
Annual MW Peak	6,705	6,865	7,369
Coincident MW Peak of Eligible Loads	6.6	6.6	6.6
Modified MW Peak	6,698	6,858	7,362
<u>Sierra</u>			
Total Annual MWh Sales	13,307,068	16,743,505	19,529,589
Eligible Annual Limit MWh Loads	-	-	-
Modified Sales	13,307,068	16,743,505	19,529,589
Annual MW Peak	2,598	2,951	3,242
Coincident MW Peak of Eligible Loads	-	-	-
Modified MW Peak	2,598	2,951	3,242

**TABLE
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NV Energy proposes that the annual limits for Nevada Power for the 2027-2029 action plan period be set at the maximum allowable level of ~~58,133,582~~ 58,982 MWh (approx. ~~6.766~~ 6.76 MW). This total action plan annual limits amount can be made available in any number of tranche combinations: broken down equally among each of the three years (~~2.232~~ 2.23 MW per year), front loaded, or back loaded. To allow the entire limit to leave at the beginning of the period, and to make the calculation of the impact on remaining customers simpler, Nevada Power proposes that the entire annual limits amount (~~6.766~~ 6.76 MW) be available in the first year of the action plan. Considering the above calculations and NV Energy's proposed limit for Nevada Power, the effect of eligible customers purchasing less energy and capacity than authorized by the proposed annual limits would be negligible.¹⁰

In the case of eligible customers located in Nevada Power's service territory purchasing less energy and capacity than authorized by the proposed annual limits, the maximum MW loads would have to be served in addition to the native load forecasted in this 2026 Joint IRP. Considering Nevada Power's anticipated peak loads and reserve margin, Nevada Power expects that it will be able to serve the additional load with minimal effect on rates paid by its customers and no effect on the

¹⁰ As provided for in the proposed regulations, if the proposed annual limit is not fully used in the first year of the action plan, the unused amount will be carried forward to the second and/or third years of the action plan.

The Variable O&M credit is calculated as the overall difference in variable O&M costs between the base case and the change case. It will be applied on a volumetric basis and reflects the reduction in variable O&M costs related to the exit of the eligible loads from bundled service.

Additionally, Section 12 of the proposed regulation submitted to the Legislative Counsel Bureau ("LCB") in Docket No. 19-06029 requires the Commission to list any current or ongoing legislatively mandated public policy programs for which eligible customers are required to pay costs, fees, charges, or rates pursuant to subsection 8 of NRS 704B.310. Those costs, fees, charges or rates which are not listed will be considered on a case-by-case basis. Accordingly, the list of current legislatively mandated public policy programs from which eligible customers are required to pay costs, fees, charges or rates approved by the Commission in Docket No. 21-06001 are as follows:

- Renewable Energy Program Rate (REPR)
- Temporary Renewable Energy Development Program Rate (TRED)
- Universal Energy Charge (UEC)
- Net Energy Metering
- Energy Efficiency and Conservation Programs (EE)
- Expanded Solar Access Program (ESAP)
- Natural Disaster Protection Plan (NDPP)
- Transportation Electrification Plan
- Economic Recovery Transportation Electrification Plan
- Economic Development Rate Rider; and
- R-BTER.

In conclusion, the results of the calculations in this proceeding demonstrate that Nevada Power customers choosing to exit the system will pay the Net Differential Energy Rate of ~~\$0.031440~~ \$0.03148 per kWh during their applicable three-year transition period which will be partially offset by the

\$-0.00001 per kWh variable O&M costs credit. In addition, such customers will pay other costs required by law including the Base Tariff Energy Rate for the transmission period and the then-current R-BTER rate (which currently stands at \$0.00463 as filed in Docket No. 26-02013) and will be updated quarterly.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing filing of **NEVADA POWER COMPANY D/B/A NV ENERGY AND SIERRA PACIFIC POWER COMPANY D/B/A/ NV ENERGY** in Docket No. 26-05007 upon the persons listed below by electronic mail:

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11 DATED this 13th day of October, 2026.

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