26-05007

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BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

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 2027-2047 Triennial Integrated Resource Plan and 2027-2029 Energy Supply Plan.	)))))	Docket No. 26-05007

NEVADA POWER COMPANY D/B/A NV ENERGY AND SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY'S RESPONSE TO RENO POWER NR 1, LLC'S REQUEST FOR EXPEDITED TREATMENT REGARDING ITS MOTION FOR DECLARATION BY THE COMMISSION

Nevada Power Company d/b/a NV Energy ("Nevada Power") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra," and, together with Nevada Power, the "Companies") submit this response to the Request for Expedited Treatment included in Reno Power NR 1, LLC's ("Tract") Motion for Declaration by the Commission (the "Motion"), filed on Monday, November 2, 2026. The Public Utilities Commission of Nevada (the "Commission") should deny the request for expedited treatment.

ARGUMENT

Tract's Motion addresses what it terms the "Enforceability Question," that is, the question of whether a Rule 9 agreement, on its own, entitles an applicant to electric service from the Companies.[1] This is a question that has already been litigated in Phase II of this proceeding, including by parties SV RNO Property Owner 1, LLC and PR RNO Property Owner 1, LLC (together, "Fleet"). Fleet's witness Dennis Bartlett, the Vice President of Energy for Tract, asserted in his Phase II testimony that he supported the position that an "Applicant's executed Rule 9 Agreement serves as the service contract under Nevada Power's and Seirra's Rule 10."[2] Other parties similarly addressed the "Enforcement Question" in Phase II.[3]

[1] Docket No. 26-05007, Tract's Motion for Declaration, Nov. 2, 2026 at i.
[2] Docket No. 26-05007, Supplemental Direct Testimony of Dennis Bartlett at 9, Q&As 13-14 (internal quotations omitted).
[3] *See* Docket No. 26-05007, Prepared Direct Testimony of Adam Danise at 14, Q&A 27.

Accordingly, Tract's Motion should properly be filed as part of the Commission's previously ordered legal briefing regarding Phase II, which explicitly outlined page limits (with opening briefs limited to 10 pages) and responsive briefing dates.

Further, Tract's Motion justifies its request for expedited treatment on the fact that "the Phase III hearing [is] scheduled to begin on Monday, November 16, 2026."[4] Again, the issues addressed by Tract's Motion were extensively discussed in Phase II. The request for expedited treatment is inappropriate because the hearing on the Phase in which the issue was addressed is not "within 14 days" as required by NAC 703.555(6).

Finally, Tract offers no explanation as to why briefing in response to a 20-page motion including nearly 100 pages of attachments must be filed within 72 hours of receipt.

CONCLUSION

Tract's Motion regarding the issues involved in its ongoing arbitration with the Companies could have been filed at any time in this proceeding. Instead, it was filed the first business day after the conclusion of the Phase II hearing and hours after the Commission and the parties to this proceeding received the Companies' Phase III rebuttal testimony. At this time, the Motion addresses issues more properly addressed in the existing Phase II briefing schedule and does not warrant expedited treatment.

[4] *Supra* n. 1 at 20.

Dated this 2nd day of November, 2026.

Respectfully submitted,

NEVADA POWER COMPANY
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SIERRA PACIFIC POWER COMPANY
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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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