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BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Application of SV RNO Property Owner 1 LLC, under the provisions of the Utility Environmental Protection Act, for a permit to construct the South Valley Temporary Power Generation Facility consisting of a temporary 144 MW natural gas-fueled electric generating facility and associated facilities to be located on private land in Storey County, Nevada.

Docket No. 26-04026

Application of PR RNO Property Owner 1, LLC, under the provisions of the Utility Environmental Protection Act, for a permit to construct the Peru Ridge Self-Generation Project consisting of a temporary 218 MW natural gas-fueled electric generating facility and associated facilities to be located on private land in Storey County, Nevada.

Docket No. 26-04027

**REGULATORY OPERATIONS STAFF'S ANSWER TO NCARE & BCP'S
PETITION FOR REHEARING ("PETITION")¹**

Under NAC 703.801(4), the Regulatory Operations Staff ("Staff") of the Public Utilities Commission of Nevada ("Commission") files this Answer to the Petition. The Petition requests a rehearing of the July 30, 2026, hearing ("Hearing"), which preceded the Commission's September 17, 2026, Order ("Order"). The Order granted SV RNO Property Owner 1 LLC ("SV RNO") and PR RNO Property Owner 1, LLC's ("PR RNO," and together with SV RNO "Applicants") Applications for Permits to Construct Projects Under the Utility Environmental Protection Act ("UEPA"). Because BCP intervened *after* the Order's issuance, the instant Answer is predominantly directed towards NCARE.

I. INTRODUCTION

The Petition fails because it: (1) does not satisfy NAC 703.801(2), (2) makes arguments that NCARE did not preserve, (3) discusses alleged errors that NCARE invited, and (4) repeats positions that

¹ "Projects" refer collectively to SV RNO's South Valley Temporary Power Generation Facility ("South Valley"), and PR RNO's Peru Ridge Self-Generation Project ("Peru Ridge"). "NDEP" is the Nevada Division of Environmental Protection. "NCARE" is Nevadans for Clean Affordable Reliable Energy. "BCP" is the Bureau of Consumer Protection. "RPS" is Nevada's Renewable Portfolio Standard. "SB" stands for Senate Bill. "Petitioners" are NCARE and BCP.

NCARE previously made. As the Petition intimates, the Hearing involved a battle of experts—a battle that NCARE lost. Having lost that battle, NCARE wants a do-over. A rehearing, however, should not occur because the record is complete and accurate. NAC 703.801(2)(a). Notably, the Order correctly describes the Commission’s role in UEPA Dockets, following the law that establishes that role. NRS 704.890(2); Order, ¶¶ 37-38. It is a limited role, requiring the Commission to avoid duplicative environmental review and to follow NDEP’s permitting rulings. *Id.*; NRS 704.877(1)(b)-(2). NCARE disagrees, insisting that the Commission’s role is expansive, a proposition at odds with applicable law. This proposition is also at odds with how the Commission has processed hundreds of UEPA Dockets over the course of multiple decades. The quality and type of evidence presented in those cases align with that which has been presented here. The Commission should deny the Petition.

II. LEGAL ANALYSIS²

A. The Petition Should be Denied Because it Does not Satisfy NAC 703.801(2)

NAC 703.801(2) requires petitions for rehearing to: (1) allege that an order is erroneous because of an incomplete or inaccurate record, (2) specifically “set forth” the nature and purpose of additional evidence “to be introduced,” and (3) show that such evidence is not cumulative and could not have been introduced during the hearing. As with reconsideration, petitions for rehearing cannot repeat positions that were already raised; such repetition does not satisfy NAC 703.801(2).³ Petitions are denied when they make arguments that were not preserved⁴ or seek to introduce “additional evidence” that is irrelevant.⁵ Here, the Petition makes arguments that NCARE did not preserve.⁶ Also, the Petition impermissibly repeats

² Staff cites Commission decisions for “[h]istorical reasons only and not for any precedential value.” *Appl. of Dep’t of Health & Human Servs.*, Docket No. 12-11027, 2013 WL 3226810, at *12 (Nev. P.U.C. May 31, 2013) (Order, ¶ 41).

³ *See generally Ducksworth v. State*, 114 Nev. 951, 953, 966 P.2d 165, 166 (1998) (“A petitioner may not [in a petition for rehearing] reargue an issue already raised or raise a new issue not raised previously.”). It is immaterial that Nevada Supreme Court “rehearing” decisions implicate a court-specific rule (i.e., NRAP 40). This is so because the Commission has determined that such “rehearing” decisions are persuasive. *See, e.g., Appl. of Air Liquide Hydrogen Energy U.S., LLC*, Docket No. 19-02002, 2019 WL 3996750, at *7 (Nev. P.U.C. Aug. 15, 2019) (Order, ¶ 29) (quoting *In re Estate of Herrmann*, 100 Nev. 149, 151, 679 P. 2d 246, 247 (1984)). The principles developed in these “rehearing” decisions apply with equal force here.

⁴ *Stanfill v. State*, 99 Nev. 499, 501, 665 P.2d 1146, 1147 (1983) (“As the contention that this appeal is controlled by *Batchelder* was not properly made in the first instance, we will not consider it now on rehearing.”).

⁵ *In re Verdi Meadows Util. Co., Inc.*, Docket Nos. 95-8021, 98-10030, 00-1008, 2003 WL 22449527 (Nev. P.U.C. Sep. 29, 2003) (Order, ¶¶ 25-27) (“The Commission finds that this information is irrelevant to the findings and conclusions reached in the Order. . . . The Commission concludes that rehearing is not warranted.”).

⁶ Pet., §§ II(A)(2) (limiting cross-examination); II(B)(2) (minimum adverse effect on environment).

positions that NCARE already made,⁷ and inappropriately seeks to introduce “additional evidence” that is irrelevant.⁸ As such, the Petition should be denied because it does not satisfy NAC 703.801(2).

B. Arguments About Limiting the Scope of Cross-examination are not Preserved Because NCARE Failed to Make Offers of Proof

NCARE insists that the Presiding Officer unduly limited the scope of NCARE’s cross examination, allegedly depriving NCARE of due process. Pet., 7:19-20. Limitation occurred because the Presiding Officer sustained objections to NCARE’s questions on several topics. *Id.* at 8:12-18. During the Hearing, NCARE failed to make a single offer of proof; not once did NCARE—in response to sustained objections—invoke NAC 703.705(2), a failure that defeats the Petition’s cross-examination arguments.

NAC 703.705(2) authorizes parties to make offers of proof to sustained objections. If a party does not make an offer of proof to a sustained objection, then that party is barred from subsequently challenging the objection’s propriety—even on appeal; such challenges are not preserved.⁹ This longstanding principle of trial and appellate practice is codified in Nevada’s Evidence Code (i.e., NRS 47.040(1)(b)) and effectuated via NAC 703.705(2).¹⁰ Here, NCARE indisputably neglected to make any offer of proof to any sustained objections. In neglecting to do so, NCARE did not preserve the Petition’s arguments about cross-examination. Such arguments cannot be raised in a petition for rehearing or brought before any court.¹¹

As for NCARE’s conclusory statements about due process, the Presiding Officer gave NCARE all the process it was due. Indeed, NCARE’s cross-examination was confusing, unduly repetitious, unfairly prejudicial, irrelevant, compound, and a waste of time—all recognized grounds for limiting the scope of cross-examination. NRS 48.035; NRS 50.115; NRS 233B.123(1). Faced with these deficiencies, the Presiding Officer displayed patience, giving NCARE leeway in asking questions. At times, the Presiding

⁷ *Id.* at §§ II(A)(1) (motion to compel); II(B)(1)(a) (NDEP’s role); II(B)(1)(b) (operational duration); II(B)(1)(c) (impact of truck trips); II(C)(1) (SB 254 (2019)); II(C)(2) (RPS); II(C)(3) (whether Applicants are “utilities”).

⁸ *Id.* at §§ II(C)(2) (RPS); II(C)(3) (whether Applicants are “utilities”).

⁹ NRS 47.040(1)(b); *Cox v. Copperfield*, 138 Nev. 235, 245, 507 P.3d 1216, 1226 (2022) (“This court ‘will not review exclusion of evidence where trial counsel makes no offer of proof’ below.”); *Burgeon v. State*, 102 Nev. 43, 47, 714 P.2d 576, 579 (1986); *McCall v. State*, 97 Nev. 514, 516, 634 P.2d 1210, 1212 (1981).

¹⁰ Offers of Proof cannot speculate about what evidence might be elicited from a witness via cross-examination. *Las Vegas Convention & Visitors Auth. v. Miller*, 124 Nev. 669, 688-89, 191 P.3d 1138, 1151 (2008) (“Offers of proof must be specific and definite; counsel’s mere conjecture as to what the evidence might reveal does not suffice.”). Here, the Petition speculates about what the Applicants might have stated in response to NCARE’s questions. Regardless, NCARE did not make a single offer of proof during the Hearing, failing to preserve the Petition’s cross-examination arguments.

¹¹ See sources cited *supra* note 9.

1 Officer gently reminded NCARE that its questions repeated material that the Presiding Officer had already
2 read. Hr’g Tr., 71:20-22, 92:13-14, 95:17-18, 112:13-15. At one point—in sustaining an objection against
3 NCARE—the Presiding Officer stated, “I think this testimony speaks for itself as well. I can read.” *Id.* at
4 92:13-14. So, NCARE received all the process it was due—and then some. No due process violation
5 occurred, which might explain why the Petition lacks a single citation to legal authority that supports its
6 conclusory due process positions.¹² Besides, the Commission has discretion over the scope of cross-
7 examination.¹³ And, if evidentiary rulings were “egregious,” Pet., 8:18, then NCARE should have sought
8 relief pursuant to NAC 703.735(2) (i.e., asking the Presiding Officer to refer rulings on the admissibility
9 of evidence to the Commission and recess a hearing). NCARE did no such thing, inappropriately inviting
10 the so-called “errors” it now decries. Having allowed these “errors” to stand unchallenged at the Hearing,
11 NCARE cannot use them now as grounds for a rehearing.¹⁴ Ultimately, arguments about limiting the scope
12 of cross-examination are not preserved because NCARE failed to make offers of proof.

13 **C. The Petition’s NRS 704.890(1)(d) Positions are Deficient Because they Involve Invited**
14 **Errors and Ignore the Record**

15 The Petition opines that the Order “misconstrues” NCARE’s NRS 704.890(1)(d) positions. Pet.,
16 19:14.¹⁵ According to NCARE, the Order created the following “strawman argument,” which NCARE
17 supposedly did not make: Applicants must conduct an exhaustive review of all available technologies. *Id.*
18 at 19:15-17. NCARE claims that nothing in the record supports this strawman. To the contrary—in
19 response to cross-examination—NCARE’s witness, Dr. Zoë Harrold, conceded, “[i]t’s really the onus of
20 the Applicants to tell us that they have explored the full range of [alternative] opportunities.” Hr’g Tr.,
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23 ¹² The Commission should reject the due process arguments because they lack supporting authority. *City of Sparks v. Best*, 96
Nev. 134, 138, 605 P.2d 638, 640 (1980) (“Respondent’s other contentions lack relevant authority, and therefore need not be
considered.”).

24 ¹³ NAC 703.690(1)(j); NRS 50.115(1); *Brown v. State*, 138 Nev. 464, 476, 512 P.3d 269, 280 (2022) (“Moreover, the district
25 court retains wide latitude to impose reasonable limits on cross-examination, such as excluding interrogation that is only
marginally relevant or would confuse the issues.”).

26 ¹⁴ *Pearson v. Pearson*, 110 Nev. 293, 297, 871 P.2d 343, 345 (1994) (“‘The doctrine of ‘invited error’ embodies the principle
27 that a party will not be heard to complain on appeal of errors which he himself induced or provoked the court or the opposite
party to commit. It has been held that for the doctrine of invited error to apply it is sufficient that the party who on appeal
complains of the error has contributed to it. In most cases application of the doctrine has been based on affirmative conduct
inducing the action complained of, but occasionally a failure to act has been referred to.”) (internal citations omitted).

28 ¹⁵ NRS 704.890(1)(d) concerns whether the Projects represent the minimum adverse effect on the environment, considering the
state of available technology and the economics and nature of the various alternatives.

64:3-4 (emphasis added).¹⁶ What the Petition calls a “strawman” is—in reality—Dr. Harrold. NCARE’s protestations to the contrary ignore the record, particularly their own witness’s testimony.

Furthermore, NCARE complains that the record does not include the Applicants’ “internal study” of available technology and alternatives; Applicants’ rebuttal mentioned this study. Pet., 20:14-21. In NCARE’s estimation, omitting this study from the record is an error, justifying a rehearing. Instead, this is an *invited* error, an alleged deficiency that NCARE contributed to; because NCARE contributed to this so-called error, NCARE cannot benefit from it by obtaining a rehearing.¹⁷ Particularly, if NCARE wanted this study in the record, then NCARE should have made an NRS 50.305 request. Pursuant to NRS 50.305, an “[e]xpert may in any event be required to disclose the underlying facts or data on cross-examination.” NRS 50.305 authorized NCARE—during its cross-examination of Applicants’ witness—to request the study’s disclosure. NCARE failed to do so, thereby inviting (i.e., contributing to) the purported error that it now contends supports a rehearing. Neither rehearing nor appellate reversal can be based on invited errors.¹⁸

Lastly, the Petition highlights the cross-examination of Dr. Harrold on the Projects’ engines: Jenbacher J420s. Pet., 21:8-12. This questioning undermined Dr. Harrold’s credibility because it: (1) demonstrated that she did not research whether J420s can run on “biofuels” like Renewable Natural Gas (“RNG”), (2) showed that she did not know that J420s can run on RNG, and (3) contradicted her testimony that the Applicants did not discuss “currently available technologies” such as “biofuels.” Hr’g Tr., 63:6-5 – 69:1-23. Documentary evidence from Jenbacher was entered into the record, showing that J420s can run on “biofuels,” including RNG, sewage gas, wood gas, and landfill gas.¹⁹ Exs. 11, 12. Faced with this evidence, Dr. Harrold conceded that the Applicants discussed J420s in the Applications, engines that can run on biofuels; this concession contradicted her statement that the Applicants did not discuss “currently available technologies,” like biofuels. *Compare* Hr’g Tr., 68:1-3, 69:21, *with* Ex. 7, 37:3-7. The Petition distorts this cross-examination by asserting that, if Staff knew that the Projects could use biofuels, then

¹⁶ In Dr. Harrold’s opinion, the Applicants should have reviewed the merits of these alternatives, which are “broad and vary widely.” Hr’g Tr., 63:25 – 64:1-2.

¹⁷ *Pearson*, 110 Nev. at 297, 871 P.2d at 345; *see also Rippo v. State*, 134 Nev. 411, 442, 423 P.3d 1084, 1111 (2018) (“The postconviction-counsel claim lacks merit as to the allegation of trial error because the alleged error was invited. . . . Under the circumstances, Rippo cannot complain that the trial court erred when his counsel participated in and invited the alleged error in granting the motion to quash.”).

¹⁸ *Id.*

¹⁹ The documentary evidence includes an “Outputs and Efficiencies” Table on nitrogen oxide (“NO_x”) from J420s using natural gas and J420s using biogas. Ex. 11, p. 2.

Staff should have disclosed this on the record. Pet., 21:10-12. Respectfully, Staff’s cross-examination disclosed on the record that J420s can use biofuels. Also, Staff disclosed on the record data that contradicted Dr. Harrold’s testimony that Applicants did not discuss technologies such as biofuels; the Applications discussed J420s, and J420s can use biofuels. Such contradiction-evidence undermines Dr. Harrold’s credibility, allowing the Commission to afford her testimony little weight.²⁰ In the end, the Petition’s NRS 704.890(1)(d) positions are deficient because they involve invited errors and ignore the record.²¹

D. Arguments About the Lifespans of the Projects’ Operations are Improper Because they Repeat NCARE’s Positions and Disregard the Record

The Petition asserts that rehearing is necessary because of the Order’s “unsupported conclusion” that the Projects will operate for a defined period. Pet., 16:13-14. In the Petition’s view, an “assumption” supports the Order’s finding that the Projects will operate for two to three years. *Id.* at 15:4-5. NCARE, however, already raised these positions, which the Order rejected in paragraphs 15-16. And the Order did so based on the pleadings, prepared testimony, and in-Hearing testimony—not on “assumptions.” Order, ¶¶ 15-16. Because NCARE previously made these positions, the Petition cannot do so again.²²

Additionally, the instant Dockets involve UEPA permits to *construct*, not permits to *operate*. The lifespan of *construction* is beyond dispute, established by the cross-examination of NCARE’s witness (i.e., Dr. Harrold). Hr’g Tr., 63:1-5. Dr. Harrold’s Prepared Direct Testimony stated that the Applicants sought a “blank check” UEPA permit without an end date. Ex. 7, 17:5. Two Data Request (“DR”) Responses refuted—not to mention contradicted—Dr. Harrold’s statement. Exs. 9, 10. Both DR Responses identified specific completion dates for construction. *Id.* These DR Responses were used to cross-examine Dr. Harrold who—albeit begrudgingly—acknowledged that both Projects have estimated construction

²⁰ *Cox*, 138 Nev. at 240, 507 P.3d at 1223 (“Contradiction evidence undermines credibility in two ways: ‘First, it permits the inference that the witness either lied or at least was mistaken with respect to the specific facts contradicted.’ Second, ‘since contradiction tends to show that the witness has erred or lied with respect to some facts, the jury could infer that the witness is generally an unreliable source of information and erred or lied with respect to other facts.’”) (internal citations omitted).

²¹ The Petition’s NRS 704.890(1)(d) positions improperly attempt to incorporate by reference arguments from NCARE’s September 10, 2026, Exceptions. Pet., 20:19, 20:24 n.56. Arguments in exceptions, however, are not part of the evidentiary record, and thus, they cannot be incorporated by reference into post-order petitions. *Appl. of Sierra Pac. Power Co. Filed Under Advice Letter No. 515-E*, Docket Nos. 11-04009, 11-04010, 11-04011, 2011 WL 6287831, at *5 (Nev. P.U.C. Dec. 8, 2011) (Order, ¶ 6) (“The arguments presented in SNHG’s Exceptions are not part of the evidentiary record established at hearing and therefore amount to additional evidentiary matter prohibited by NAC 703.801(1)(b).”).

²² See sources cited *supra* note 3.

1 completion dates (i.e., December 2, 2027, for South Valley, and August 1, 2027, for Peru Ridge). This line
2 of cross-examination culminated as follows:

3 [STAFF]: So, Applicants are not requesting permits to construct that have
4 no end date but rather estimated end dates of December 2nd and August 1,
5 2027, right?

6 ZOE HARROLD: Correct.²³

7 Hence, there is no dispute about the lifespan of the Projects' construction. There is no dispute that these
8 Dockets involve UEPA permits to *construct*, as opposed to permits to *operate*. There is no dispute that
9 NCARE already raised arguments about the lifespan of the Projects' operation, precluding the Petition
10 from repeating them here. As a result, arguments about the lifespans of the Projects' operations are
11 improper because they repeat NCARE's positions and disregard the record.

12 **E. Positions Regarding Truck Trips are Unavailing Because they were Already Made by**
13 **NCARE, Capitalize on Invited Errors, and Result from a Battle of Experts**

14 The Petition discusses truck trips that will occur when the Projects are operating. Pet., 17:15-16.
15 Petitioners summarize Dr. Harrold's testimony on this topic along with the testimony of the Applicants'
16 witness, Dennis Bartlett. *Id.* at 17:20-22 – 18:1-9. The Commission has already read and weighed this
17 testimony. Nonetheless, Petitioners quip that Mr. Bartlett was not "established" as an expert on the
18 environmental impact of the truck trips. *Id.* at 18:20-22 n.47. In a rare move, the Petition acknowledges
19 that the Order "correctly characterizes" NCARE's argument that the record lacks evidence of the
20 environmental impact of the truck trips. *Id.* at 18:10-12. Then, the Petition attacks the Order for rejecting
21 NCARE's position, finding instead that the Environmental Statements refute NCARE's argument about
22 the truck trips. *Id.* at 18:13-17 – 19:1-2. Dissatisfied with the Order, the Petition demands a rehearing;
23 Petitioners support this demand by repeating NCARE's contention that the record lacks evidence of the
24 environmental impact of the truck trips.

25 Petitions for rehearing cannot parrot prior positions.²⁴ Here, the Petition admits that it is parroting
26 NCARE's arguments about the truck trips. Pet., 18:10-17. This is inappropriate, incapable of triggering a
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28 ²³ Hr'g Tr., 63:1-5.

²⁴ *Ducksworth*, 114 Nev. at 953, 966 P.2d at 166.

1 rehearing. Likewise, the Petition baselessly states that the record is “incomplete and inaccurate” on the
2 environmental impact of the truck trips. *Id.* at 19:2-3. In reality, the record shows that the environmental
3 impact of the truck trips implicated a battle of experts: Mr. Bartlett v. Dr. Harrold. A battle of experts
4 transpires when experts for opposing parties offer competing opinions, with the Presiding Officer giving
5 more weight to one over the other. In the instant cases, Mr. Bartlett’s opinion was that the truck trips were
6 an “[i]nsignificant number in terms of probable environmental impacts.” Ex. 14, 9:11-12. This opinion was
7 based on the Environmental Statements, along with Mr. Bartlett’s special knowledge, skill, experience,
8 training, and education. NRS 50.275; NRS 50.285(1). Dr. Harrold disagreed with Mr. Bartlett’s opinion,
9 thereby creating a battle of experts.²⁵ As the Order makes plain, NCARE and Dr. Harrold lost this battle.
10 Contrary to the Petition’s baseless statements, the record is complete and accurate on the truck trips issue.

11 Importantly, NCARE declined to ask Mr. Bartlett a single question about the truck trips, even
12 though his Rebuttal refuted Dr. Harrold’s testimony on that issue. NCARE made a strategic decision to
13 refrain from using cross to explore or challenge Mr. Bartlett’s opinions on the truck trips.²⁶ For NCARE to
14 belatedly assert that Mr. Bartlett’s opinions lack “supporting facts”—as the Petition does here—is to
15 bemoan an alleged evidentiary deficiency to which NCARE contributed. By not asking Mr. Bartlett
16 questions on his truck trip testimony, NCARE contributed to—and thus *invited*—the alleged absence of
17 “supporting facts.” This constitutes an invited error. Rehearing, however, cannot be based on invited errors.

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24 ²⁵ Neither Mr. Bartlett nor Dr. Harrold’s testimony bound the Commission. *Allen v. State*, 99 Nev. 485, 488, 665 P.2d 238, 240
25 (1983). Rather, the Presiding Officer had discretion to: (1) use this testimony “[t]o understand the evidence or to determine a
26 fact in issue[.]” NRS 50.275, (2) assess both experts’ credibility, and (3) weigh this testimony. And that is exactly what the
27 Presiding Officer did, tacitly giving more weight to Mr. Bartlett’s testimony. This is the Presiding Officer’s prerogative, an
28 exercise of discretion that is well supported by the record, informed by the substance of each witness’s testimony, and guided
by each witness’s in-Hearing demeanor. *McCall v. Carlson*, 63 Nev. 390, 413, 172 P.2d 171, 182 (1946).

²⁶ *Rimer v. State*, 131 Nev. 307, 331, 351 P.3d 697, 714 (2015) (“[O]pposing parties are allowed to [use cross-examination to] explore and challenge the basis of an expert witness’s opinion.”); *Blake v. State*, 121 Nev. 779, 790, 121 P.3d 567, 574 (2005) (“It is a fundamental principle in our jurisprudence to allow an opposing party to explore and challenge through cross-examination the basis of an expert witness’s opinion.”).

1 Finally, the Petition states that Mr. Bartlett was not “established” as an expert on the environmental
2 impact of the truck trips. Pet., 18:20-22 n.47. At no point during the Hearing did NCARE raise this issue,
3 thereby failing to preserve this position. Indeed, NCARE never brought an “NRS 50.275 *Hallmark v.*
4 *Eldridge* Qualification Requirement Challenge”²⁷ to Mr. Bartlett.²⁸ Nor did NCARE request the Presiding
5 Officer to—under NAC 703.685(4)—determine whether Mr. Bartlett lacks specific expertise to testify on
6 the truck trips.²⁹ Because NCARE neglected to make these arguments at the Hearing, the Petition is barred
7 from challenging whether Mr. Bartlett was “established” as an expert on the truck trips. All told, positions
8 regarding truck trips are unavailing because they were already made by NCARE, capitalize on invited
9 errors, and result from a battle of experts.

10 **F. Arguments About Whether the Applicants are “Utilities” Fail Because they Repeat**
11 **NCARE’s Positions, Constitute Red Herrings, and Disregard the Record**

12 Petitioners demand a rehearing to determine whether the Applicants are “public utilities.” Pet.,
13 24:15-20 – 25:1-13. Supposedly, the record does not resolve this issue, a position that NCARE previously
14 raised. The Petition alleges that the Presiding Officer improperly prevented NCARE from conducting
15 discovery and cross-examination on this topic. *Id.* Because NCARE already made these arguments—which
16 the Order soundly rejected—the Petition cannot make them again. In fact, the Order determined that the
17 “public utilities” issue is irrelevant. Order, ¶ 69. If a petition for rehearing seeks to introduce “additional
18 evidence” that is irrelevant, then that petition is denied.³⁰ So too here; the Petition should be denied because
19 it seeks to introduce “additional evidence” that is irrelevant.

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22 ²⁷ *Hallmark v. Eldridge*, 124 Nev. 492, 498, 189 P.3d 646, 650 (2008); NRS 50.275 (“If scientific, technical or other specialized
knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert
by special knowledge, skill, experience, training or education may testify to matters within the scope of such knowledge.”).

23 ²⁸ In court, because NCARE failed to assert that Mr. Bartlett is unqualified to offer “[t]he proffered opinion under *Hallmark*[,]”
24 a judge would not have had to conduct a *Hallmark* analysis of whether Mr. Bartlett qualifies as an expert on the truck trips.
25 *Dickey v. State*, 140 Nev. ___, ___, 540 P.3d 442, 452-53 (2024) (“First, we make clear that when a party objects to the
26 qualifications of a witness on the basis that the witness is not qualified to offer the proffered opinion under *Hallmark*, the district
court is required to either conduct a full *Hallmark* analysis or to make clear expert qualification is not necessary. Because Dickey
properly raised an objection based on Soto’s qualifications to testify on the geolocation data, and because it appears the district
court dispatched this objection through an incomplete *Hallmark* analysis, we conclude the district court erred in failing to
conduct a complete *Hallmark* analysis regarding Soto’s testimony.”).

27 ²⁹ NAC 703.685(4) (“If the presiding officer determines that a witness lacks specific experience, expertise or direct knowledge
to testify on the subject on which the witness is testifying, the presiding officer may strike the testimony of the witness and
dismiss the witness from testifying in the proceeding.”).

28 ³⁰ *In re Verdi Meadows Util. Co., Inc.*, 2003 WL 22449527 (Nev. P.U.C. Sep. 29, 2003) (Order, ¶¶ 25-27).

1 Furthermore, the “public utilities” issue is a red herring. If the Applicants were “utilities,” then Dr.
2 Harrold’s Prepared Direct Testimony would have: (1) analyzed NRS 704.890(1)(f) and (2) criticized the
3 Applicants for not providing Surplus Asset Retirement Plans (“SARPs”). NRS 704.890(1)(f) establishes
4 requirements that SARPs must satisfy. Critically, only electric utilities file SARPs. NRS 704.734(1). So,
5 NRS 704.890(1)(f) is inapplicable to UEPA applicants who are *not* electric utilities; such applicants do not
6 file SARPs, rendering NRS 704.890(1)(f)’s SARP requirements to be immaterial. Here, Dr. Harrold never
7 analyzed NRS 704.890(1)(f). Nor did she criticize the Applicants for not providing SARPs. Tellingly,
8 NCARE propounded DRs, asking the Applicants why they did not file SARPs; Dr. Harrold was the
9 “Requester” for both DRs. Ex. 13, Attachs. RMS-6, RMS-12. The DR Responses—which are attached to
10 Staff’s Prepared Direct Testimony—stated that the Applicants did not provide SARPs because the
11 Applicants are not utilities. *Id.* This unequivocal representation (i.e., that the Applicants are not utilities)
12 should have elicited responses from NCARE and Dr. Harrold.³¹ No responses occurred—neither in
13 testimony nor at the Hearing. To recap, NCARE—and Dr. Harrold—ignored NRS 704.890(1)(f), refrained
14 from criticizing the Applicants for omitting SARPs, and failed to contest DR Responses that affirmatively
15 and unequivocally stated that the Applicants are not utilities.³² NCARE failed to take these actions because
16 the “public utilities” issue is a red herring; Applicants are not utilities—just as their DR Responses state.³³
17 There is another reason why the “public utilities” issue is a red herring: NRS 704.021(13). Order, ¶ 69.

18 Under NRS 704.021(13), “public utility” does not include plant or equipment that is used by a data
19 center to produce, deliver, or furnish electricity. It is undisputed that the Projects consist of equipment or
20 plant that will be used by data centers to produce, deliver, or furnish electricity. In particular, Dr. Harrold
21 recounted the following statement by the Applicants: They will use the Projects “to provide electric
22 service” to data centers. Ex. 7, 6:11-13. Then, Dr. Harrold *agreed* with this statement, noting that the
23 Projects are designed “solely to meet the needs” of data center operations. *Id.* at 23:14-15. Dr. Harrold goes
24

25 ³¹ After all, Dr. Harrold opined that NCARE’s discovery suggests that the operation of the Projects might meet the definition of
26 “public utility.” Ex. 7, 40:4-6. Dr. Harrold made no mention of the DRs in Ex. 13, Attachs. RMS-6, RMS-12.

27 ³² If the Applicants were utilities, then NCARE—and Dr. Harrold—would have done precisely the opposite (i.e., they would
28 have addressed NRS 704.890(1)(f), criticized the Applicants for excluding SARPs, and contested the DR Responses).

³³ It is reasonable to infer from NCARE’s inactions—pertaining to SARPs—that the “public utilities” issue is a red herring. *Jain v. McFarland*, 109 Nev. 465, 476, 851 P.2d 450, 457 (1993) (“Counsel is allowed to argue any reasonable inferences from the evidence the parties have presented at trial.”); *Heidtman v. Nev. Indus. Comm’n*, 78 Nev. 25, 31, 368 P.2d 763, 766 (1962) (“A finding of fact may be based upon an inference which is supported by the evidence.”).

on, referencing “Applicants’ private need to secure electricity service for their data center campuses.” *Id.* at 30:16. Thus, it is undisputed that the Projects will be used by data centers to produce, deliver, or furnish electricity. These undisputed facts establish that NRS 704.021(13) applies to the Projects, preventing them from being utilities. Order, ¶ 69. Such facts also reveal that the “public utilities” issue is a red herring. And, because Dr. Harrold’s testimony is in the record, the “public utilities” issue improperly disregards the record, including testimonial admissions made by NCARE’s own witness. This is but another reason for the Commission to deny the Petition. At bottom, arguments about whether the Applicants are “utilities” fail because they repeat NCARE’s positions, constitute red herrings, and disregard the record.

G. The Petition’s RPS and SB 254 (2019) Assertions are Meritless Because they Seek to Introduce Irrelevant “Additional Evidence” and Repeat NCARE’s Positions

As mentioned above, petitions for rehearing are denied when they seek to introduce “additional evidence” that is irrelevant.³⁴ Petitions cannot include new arguments³⁵ or repeat old positions.³⁶ Here, the Order determined that the RPS’ applicability is irrelevant, a ruling supported by the law. Order, ¶ 69. Petitioners, however, state that rehearing will enable them to obtain evidence pertaining to the RPS. Pet., 19-20. The Petition should, therefore, be denied because it seeks to obtain—and then introduce—irrelevant “additional evidence.” Similarly, the Petition’s arguments about the RPS and SB 254 (2019) do not trigger a rehearing because NCARE already made these arguments. Lastly, the Petition argues that NEV. CONST., art. IV, § 39(1) bolsters the RPS positions. *Id.* at 23:7-8. The Petition is bereft of any citation to the record where this argument was made or where NEV. CONST., art. IV, § 39 was referenced. This is so because such an argument is new; no Party raised this argument in testimony or during the Hearing. As the NEV. CONST., art. IV, § 39(1) arguments are new, they cannot be included in a petition for rehearing, providing yet another reason for why the Petition should be denied. In sum, the Petition’s RPS and SB 254 (2019) assertions are meritless because they seek to introduce irrelevant “additional evidence” and repeat NCARE’s positions.

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³⁴ *In re Verdi Meadows Util. Co., Inc.*, 2003 WL 22449527 (Nev. P.U.C. Sep. 29, 2003) (Order, ¶¶ 25-27).

³⁵ *Ducksworth*, 114 Nev. at 953, 966 P.2d at 166.

³⁶ *In re Estate of Herrmann*, 100 Nev. at 151, 679 P. 2d at 247 (“Nor may a litigant raise new legal points for the first time on rehearing.”).

1 **H. Arguments Regarding NDEP do not Satisfy NAC 703.801(2) and Mischaracterize**
2 **NDEP's Authority**

3 Petitions for rehearing do not encompass issues of law; they are confined to a precise *evidentiary*
4 error. The error is: Whether an order “is in error” because the record is incomplete or inaccurate. NAC
5 703.801(2)(a). In part, this is why petitions must describe additional evidence that would be introduced,
6 and “show” that such evidence is not cumulative “[a]nd could not have been introduced at the hearing.”
7 NAC 703.801(2)(b)-(c). The Petition’s § II(B)(1)(a) (“Impacts Wrongly Deferred to NDEP”) fixates
8 exclusively on issues of law (i.e., statutory construction and regulatory jurisdiction). This section does not
9 “specifically set forth” the additional evidence that NCARE wants to introduce. Because § II(B)(1)(a)
10 solely discusses issues of law—and fails to “specifically” describe additional evidence—§ II(B)(1)(a) does
11 not satisfy NAC 703.801(2)’s standard for rehearing.

12 Assuming *arguendo* that § II(B)(1)(a) satisfies NAC 703.801(2)—which it fails to do—there are
13 additional reasons for why the Commission should reject § II(B)(1)(a)’s contentions. For starters, the
14 Petition describes NRS 704.890(1) as imposing “policy-balancing obligations” on the Commission. Pet.,
15 12:23-24 n.29. Wrong. This statute, along with the rest of UEPA’s provisions (i.e., NRS 704.820 – NRS
16 704.900), concerns a process: The “[p]rocess for the issuance by the Commission . . . of a permit[.]” to
17 construct a utility facility. NRS 704.863(1). This means that NRS 704.890(1) is a part of “the process” for
18 the issuance of a construction permit. *Id.* Next, § II(B)(1)(a) alleges that “NDEP has not acted[.]” Pet.,
19 12:17. Wrong again. NDEP has—by operation of law—received and reviewed the Applications. NRS
20 704.870(3) required the Applicants to provide NDEP with the Applications. Certificates of Service confirm
21 that the Applications were sent to NDEP,³⁷ raising a rebuttable presumption that NDEP received the
22 Applications.³⁸ Likewise, pursuant to NRS 704.875, NDEP “shall review” the Applications. NRS 704.875
23 imposes an official duty on NDEP, a duty that—by operation of law—NDEP has presumptively
24 performed.³⁹ NCARE failed to offer a single piece of evidence that rebuts these presumptions.⁴⁰ The

25 _____
26 ³⁷ Ex. 1, PDF p. 121 of 121 (“Certificate of Service”); Ex. 2, PDF p. 116 of 116 (“Certificate of Service”).

27 ³⁸ NRS 47.250(13) (“All other presumptions are disputable. The following are of that kind: . . . That a letter duly directed and
28 mailed was received in the regular course of the mail.”).

³⁹ NRS 47.250(9) (“All other presumptions are disputable. The following are of that kind: . . . That official duty has been
regularly performed.”).

⁴⁰ NRS 47.180(1) (“A presumption . . . imposes on the party against whom it is directed the burden of proving that the
nonexistence of the presumed fact is more probable than its existence.”); *Law Offs. of Barry Levinson, P.C. v. Milko*, 124 Nev.

Petition is simply incorrect; NDEP “acted” by reviewing the Applications.⁴¹ In fact, NDEP is a Party to these Dockets, and was authorized to participate in the Hearing.⁴² After reviewing the Applications, NDEP did not participate in the Hearing. If the Commission’s analysis of the Applications—and the Order’s disposition of the issues presented—incorrectly described NDEP’s jurisdiction, role, or authority, then NDEP could have voiced its disapproval. Alas, it is *NCARE*—not NDEP—that voiced disapproval. NCARE, however, is not NDEP.

Additionally, § II(B)(1)(a) asserts that NDEP’s air permit review is “ministerial.” Pet., 12:18-19, 13:14-16. Yet, Dr. Harrold’s Prepared Direct Testimony was littered with NDEP material and references; excerpts of the Applicants’ NDEP applications were attached. Ex. 7, Attachs. ZH-2, ZH-3. In 48 pages of testimony, Dr. Harrold never opined that NDEP’s air permit review is “ministerial.” Dr. Harrold’s extensive reliance on NDEP material suggests that NDEP’s review is not “ministerial.” Besides, UEPA prohibits the Commission from duplicating NDEP’s review, mandating “cooperation” between these agencies. NRS 704.877(1)(b); NRS 704.877(2). UEPA explicitly mentions and cross-references NDEP.⁴³ Contrastingly, the specific statutes governing NDEP’s permitting review never mention or cross-reference the Commission.⁴⁴ And, unlike UEPA, the statutes controlling NDEP’s review do not prohibit NDEP from duplicating the Commission’s review or command NDEP to “cooperate” with the Commission. Then again, NDEP’s statutes do not: (1) make the Commission a party to NDEP proceedings, (2) require permit applicants to provide their applications to the Commission, or (3) raise a rebuttable presumption that the Commission reviewed NDEP applications. Meanwhile, UEPA does all of this for NDEP.⁴⁵ In conclusion, arguments regarding NDEP do not satisfy NAC 703.801(2) and mischaracterize NDEP’s authority.⁴⁶

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355, 366, 184 P.3d 378, 386 (2008) (“In general, rebuttable presumptions require the party against whom the presumption applies to disprove the presumed fact.”).

⁴¹ NRS 47.250(9); NRS 47.250(16) (codifying the rebuttable presumption “[t]hat the law has been obeyed.”).

⁴² NRS 704.875 (NDEP “[m]ay participate in any proceeding held pursuant to NRS 704.880.”); NRS 704.885(1)(b) (NDEP is a party).

⁴³ NRS 704.870(3) (applications must be sent to NDEP); NRS 704.875 (NDEP reviews applications); NRS 704.885(1)(b) (NDEP is a party and may participate in UEPA hearings).

⁴⁴ NRS 445B.210; NRS 445B.300 – NRS 445B.360.

⁴⁵ NRS 704.870(3); NRS 704.875; NRS 704.885(1)(b).

⁴⁶ Section II(B)(1)(a) seeks to incorporate NCARE’s Exceptions. Pet., 12:10-11. This is inappropriate because exceptions are not part of the record. *Appl. of Sierra Pac. Power Co. Filed Under Advice Letter No. 515-E*, 2011 WL 6287831, at *5.

1 **I. Positions Concerning the Motion to Compel are Baseless Because NCARE was**
2 **Dilatory, the Alleged Errors were Invited, and NCARE Already Made these Positions**

3 The Petition argues in favor of NCARE’s Motion to Compel (“Motion”). This is the third time that
4 NCARE has made such arguments. NCARE’s positions first appeared in the Motion, only to be repeated
5 during the Hearing. And now, the Petition recycles NCARE’s positions yet again—reason enough to deny
6 the Petition. Again, petitions for rehearing cannot repeat positions that were already raised. There are more
7 reasons for rejecting the Petition’s arguments about the Motion. **First**, the Petition claims that NRCP
8 26(b)(1) dictates the scope of discovery in Commission cases. Pet., 5:8-9. Incorrect. NAC 703.680(1)
9 establishes discovery’s scope. The NRCP come into play only when a matter “is not covered by” NAC
10 703’s provisions. NAC 703.105(2). Because the scope of discovery is “covered by” an NAC 703 provision
11 (i.e., NAC 703.680(1)), NRCP 26(b)(1) does not govern discovery’s scope.

12 **Second**, Petitioners challenge the Presiding Officer’s ruling that the Hearing mooted the Motion.
13 As Petitioners see it, the “arrival of the hearing” is an invalid reason to deny the Motion. Pet., 7:2-12. This
14 position not only disregards the Presiding Officer’s broad discretion over discovery, but it also
15 misunderstands the relationship between discovery and hearings.⁴⁷ Discovery occurs *before* a hearing,
16 imposing a duty on parties to pursue discovery diligently.⁴⁸ The longstanding expectation is that parties
17 will finish discovery *before* a hearing begins. Here, NCARE filed the Motion nearly one month after
18 receiving Responses to NCARE’s second set of DRs. This is dilatory, contrary to NCARE’s duty of
19 diligence.⁴⁹ If the information sought by NCARE’s DRs was “critical”—to use the Petition’s word—then
20 NCARE should have scheduled a discovery teleconference with the Presiding Officer and the Parties. A
21 teleconference would have expeditiously resolved the issues presented in the Motion, doing so *before* the
22 Hearing. From the beginning, NCARE was put on notice that these Dockets have an accelerated timeframe.

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26 ⁴⁷ *State v. Second Jud. Dist. Ct.*, 134 Nev. 770, 772, 431 P.3d 47, 50 (2018) (“District courts enjoy broad discretion in the realm
of discovery disputes.”).

27 ⁴⁸ *See, e.g., Hahn v. Yackley*, 84 Nev. 49, 54, 436 P.2d 215, 218 (1968) (“There is wide discretion in the trial court to control the
conduct of pretrial discovery by any party to the action. However, a party who feels he is aggrieved by the actions of another
party in engaging in pretrial discovery must make his complaint known in a timely manner to the trial court and seek either a
protective order or a ruling establishing fault upon the record to preserve the question for our consideration.”).

28 ⁴⁹ “Diligence” is the constant effort to accomplish an aim. *Kroeger v. King*, 103 Nev. 536, 537-38, 746 P.2d 630, 630-31 (1987).

Owing to this timeframe, NCARE should have sought relief sooner, rather than later. Once again, NCARE invited “errors” that purportedly justify a rehearing.⁵⁰ Rehearing cannot be predicated on invited errors.

Third, NCARE refuses to take responsibility for its dilatoriness. To the contrary, the Petition shifts blame to the Presiding Officer, noting that he “had ample time” to decide the Motion (i.e., roughly seven days). Pet., 7:24 n.18. It is not the Presiding Officer’s duty to conduct discovery diligently; that is NCARE’s duty, one that it breached by delaying the Motion’s filing, failing to request a teleconference, and disregarding these cases’ accelerated timeframe. As the movant, NCARE had a duty to prod the Presiding Officer to issue a ruling.⁵¹ NCARE sat on its hands, allowing the Hearing to begin, knowing that the Motion was pending. Any supposed “errors” are of NCARE’s own making.

Fourth, during the Hearing, the Presiding Officer directed NCARE to NAC 703.825. Hr’g Tr., 8:17. This law governs petitions for declaratory orders and advisory opinions. The Presiding Officer remarked, if a Party wants a ruling on whether the Applicants are “public utilities” or “providers of electric service,” then “I recommend they employ the provisions of NAC 703.825 and request an advisory opinion or declaratory order from the Commission.” *Id.* at 8:16-18. The Presiding Officer made this statement on July 30, 2026. More than two months have elapsed, all without NCARE filing a petition. Yet again, NCARE is dilatory, neglecting to file a petition on issues that are allegedly of “critical importance.” Pet., 6:13. Regardless, positions concerning the Motion to Compel are baseless because NCARE was dilatory, the alleged errors were invited, and NCARE already made these positions.

J. Petitioners Cannot Respond Because NAC 703.801 does not Contemplate Replies

If a regulation does not contemplate the filing of a document, then such a document is a “fugitive document.”⁵² The Commission may strike or refuse to consider “fugitive documents.”⁵³ Here, NAC 703.801 does not contemplate replies to answers to petitions for rehearing. If Petitioners file a Reply—or

⁵⁰ *Hylton v. Eighth Jud. Dist. Ct.*, 103 Nev. 418, 427, 743 P.2d 622, 628 (1987) (“Defendant should not benefit from difficulties of his own creation.”).

⁵¹ *See generally Allyn v. McDonald*, 117 Nev. 907, 912, 34 P.3d 584, 587 (2001) (“As the promoter of its case, the plaintiff has the duty to carefully track the crucial procedural dates and to actively advance the case at all stages, a duty that may require the plaintiff to take initiative and prod the district court when the case sits dormant.”).

⁵² *Show Cause Proc. to Determine why Certificates of Pub. Convenience & Necessity Should not be Revoked*, Docket No. 19-10005, 2020 WL 2572546, at *3 n.3 (Nev. P.U.C. Apr. 30, 2020).

⁵³ *Id.*; *see also Molarius v. Silver Springs Water Co.*, Docket No. 14-11002, 2015 WL 1359325, at *1 n.1 (Nev. P.U.C. Mar. 20, 2015) (Order, ¶ 10 n.1).

1 other responsive document—to this Answer, then it should be stricken. In short, Petitioners cannot respond
2 because NAC 703.801 does not contemplate replies.⁵⁴

3 **III. CONCLUSION**

4 The Commission should deny the Petition because it: (1) violates NAC 703.801(2), (2) makes
5 arguments that NCARE did not preserve, (3) discusses alleged errors that NCARE invited, and (4) repeats
6 positions that NCARE previously made. At times, NCARE forgets what these cases are about, losing sight
7 of why the Parties are here. In contrast, the Commission, Staff, and the Applicants know why the Parties
8 are here. Staff’s witness summed it up: “We’re here for a permit to construct, not a permit to operate.” Hr’g
9 Tr., 102:12-13. Yet, NCARE conducted discovery, filed testimony, and examined witnesses predominantly
10 on the Projects’ *operation*—not their *construction*. Likewise, NCARE sought to expand the Commission’s
11 role in UEPA Dockets, and trivialized NDEP’s role as being “ministerial.” NCARE went so far as to claim
12 that the UEPA statutes impose so-called “policy-balancing obligations” on the Commission. Pet., 12:23-
13 24 n.29. UEPA statutes, however, are quite literally about a “*process*.” NRS 704.863(1). It is a process that
14 the Commission has rigorously followed for decades, consistently applying this process to hundreds of
15 applicants in hundreds of cases.

16 NCARE wants the Commission to abandon this statutory “process,” mostly because the instant
17 Dockets concern data centers and natural gas. There is no mystery about NCARE’s agenda, no gloss to
18 their bias; at the Hearing, NCARE pejoratively described these cases as “dirty data center development[.]”
19 Hr’g Tr., 9:12. For NCARE, the perceived ends of avoiding “dirty data center development” justify the
20 means of abandoning a longstanding statutory “process.” NRS 704.863(1). Nevada law does not support
21 this abandonment. Besides, NCARE’s arguments are internally inconsistent. NCARE insists that the
22 Commission *simultaneously* apply a “higher standard” *and* “not apply heightened scrutiny to the
23 Projects[.]” Pet., 3:5-6, 14:4.⁵⁵ The Commission should be consistent with past practice and the law: Follow

24 ⁵⁴ *Appl. of Spring Creek Utils. Co. for Auth. to Increase Water Serv. Rates*, Docket No. 11-12032, 2012 WL 5295948, at *2
25 (Nev. P.U.C. Oct. 1, 2012) (Order, 3:n.1). Staff fully reserves its right to file a motion to strike or pursue other appropriate
26 responses to fugitive documents filed in Commission proceedings.

27 ⁵⁵ A “heightened” Standard of Proof does not apply to these Dockets. In UEPA cases, the Commission applies the
28 Preponderance-of-the-Evidence Standard of Proof, which is the *lowest* standard. NRS 233B.0375; NRS 233B.121(9); NRS
233B.125; *Nassiri v. Chiropractic Physicians’ Bd. of Nev.*, 130 Nev. 245, 251, 327 P.3d 487, 491 (2014). There is no *lower*
standard. *Nassiri*, 130 Nev. at 251, 327 P.3d at 491. The issue presented is whether the Commission finds that the existence of
Id.; *Brown v. State*, 107 Nev. 164, 166, 807 P.2d 1379, 1381 (1991). Nevada’s Supreme Court has held that “[t]he preponderance-

1 the statutory “process,” just as the Commission has consistently done in hundreds of UEPA Dockets over
2 the course of decades. The Commission should deny the Petition.

3 RESPECTFULLY SUBMITTED this 15th day of October 2026.

4
5 PUBLIC UTILITIES COMMISSION OF NEVADA
6 REGULATORY OPERATIONS STAFF

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28 of-the-evidence standard is appropriate to protect the procedural due process rights of those confronted with possible revocation
of emission-station and inspector licenses.” *Nassiri*, 130 Nev. at 251, 327 P.3d at 491. So too here; the Order’s adherence to the
Preponderance-of-the-Evidence Standard of Proof protected NCARE’s procedural due process rights.

PROOF OF SERVICE

I hereby certify that I have on this day served the foregoing document upon all parties of record in this proceeding by electronic mail to the recipient's current electronic mail address.

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DATED at Las Vegas, Nevada, on the 15th day of October 2026.

/s/ Michelle Jackson
An employee of the Public Utilities
Commission of Nevada