26-04026

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In accordance with NRS Chapter 719,
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by: /s Jenna Styles

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Staff Counsel Division

FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 7/8/2026

JOE LOMBARDO
Governor

STATE OF NEVADA

PUBLIC UTILITIES COMMISSION

HAYLEY WILLIAMSON
Chair

TAMMY CORDOVA
Commissioner

RANDY J. BROWN
Commissioner

STEPHANIE MULLEN
Executive Director

July 8, 2026

Trisha Osborne, Assistant Commission Secretary
PUBLIC UTILITIES COMMISSION OF NEVADA
1150 East William Street
Carson City, NV 89701

RE: Docket Nos. 26-04026 & 26-04027 – Staff's Prepared Direct Testimony

Dear Ms. Osborne:

Please find attached for filing the Prepared Direct Testimony of the following witness for the Regulatory Operations Staff ("Staff") for this proceeding:

- Ryan Sinclair

The testimony of Staff is based on the results of Staff's review, investigation, and analysis of the information and proposals contained in the above-referenced filings. The fact that a specific issue or position is not directly addressed in Staff's testimony should not be construed as an agreement with, endorsement of, or consent to that issue or position. Rather, Staff's testimony and the recommendations contained therein serve to balance the interests of customers and shareholders of public utilities consistent with the legislative policy set forth in Nevada Revised Statutes § 704.001.

If you have any questions, then please contact me directly.

Sincerely,

/s/ *Jesse Panoff*
Jesse Panoff, Assistant Staff Counsel

JP/js
Attachments

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 Carson City, Nevada, on the 8th day of July, 2026.

/s/ Jenna Styles
An employee of the Public Utilities Commission of Nevada

PUBLIC UTILITIES COMMISSION OF NEVADA
Docket Nos. 26-04026 & 26-04027

Prepared Direct Testimony of
Ryan Sinclair, P.E. on behalf of the
Regulatory Operations Staff

1. Q. Please state your name, occupation, and business address.

A. My name is Ryan Sinclair. I am a Regulatory Engineer for the Regulatory Operations Staff ("Staff") of the Public Utilities Commission of Nevada ("Commission"). My business address is 1150 E. William St., Carson City, NV 89701.

2. Q. Does Attachment RMS-1 summarize your professional background?

A. Yes, it does.

3. Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide Staff's recommendations concerning: (1) the Application of SV RNO Property Owner 1 LLC under the provisions of the Utility Environmental Protection Act ("UEPA"), 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 (i.e., Docket No 26-04026) and (2) the Application of PR RNO Property Owner 1, LLC, under the provisions of the UEPA, 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 (i.e., Docket No. 26-04027).

4. Q. What are your recommendations to the Commission regarding the issues outlined in Q&A 3?

A. I recommend that the Commission:

1) Find that SV RNO Property Owner 1 LLC's ("SV RNO") Environmental Statement identifies the nature of the probable effect of the South Valley Temporary Power Generation Facility on the environment and the required mitigation measures. Determine that SV RNO's Application (and various Data

Request ("DR") Responses) addresses: (a) the nature of the South Valley Temporary Power Generation Facility's probable effect on the environment, (b) the extent to which the South Valley Temporary Power Generation Facility is needed to ensure reliable utility service to customers in Nevada, (c) the need for the South Valley Temporary Power Generation Facility balances any adverse effect on the environment, (d) the South Valley Temporary Power Generation Facility represents the minimum adverse effect on the environment (considering the state of available technology and the nature and economics of the various alternatives), (e) the South Valley Temporary Power Generation Facility's location—as proposed—conforms to applicable state and local laws and regulations and SV RNO has obtained, or is in the process of obtaining, all other permits, licenses, registrations, and approvals required by federal, state, and local statutes, regulations, and ordinances, and (f) the South Valley Temporary Power Generation Facility will serve the public interest. Based on these findings and determinations, approve the request of SV RNO under the provisions of the UEPA, 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, contingent upon SV RNO obtaining and filing with the Commission as compliance items, if not already included in the filing, permits, licenses, and approvals that are described below. Staff further recommends that the Commission's order contain a provision that if SV RNO does not file with the Commission all the compliances set forth below, within five years of the effective date of the order, then the order will be deemed to be vacated without further action by, or order of, the Commission.

2) Find that PR RNO Property Owner 1 LLC's ("PR RNO") Environmental Statement identifies the nature of the probable effect of the Peru Ridge Self-Generation Project on the environment and the required mitigation measures.

Determine that PR RNO's Application (and various DR Responses) addresses: (a) the nature of the Peru Ridge Self-Generation Project's probable effect on the environment, (b) the extent to which the Peru Ridge Self-Generation Project is needed to ensure reliable utility service to customers in Nevada, (c) the need for the Peru Ridge Self-Generation Project balances any adverse effect on the environment, (d) the Peru Ridge Self-Generation Project represents the minimum adverse effect on the environment (considering the state of available technology and the nature and economics of the various alternatives), (e) the Peru Ridge Self-Generation Project's location—as proposed—conforms to applicable state and local laws and regulations and PR RNO has obtained, or is in the process of obtaining, all other permits, licenses, registrations, and approvals required by federal, state, and local statutes, regulations, and ordinances, and (f) the Peru Ridge Self-Generation Project will serve the public interest. Based on these findings and determinations, approve the request of PR RNO, under the provisions of the UEPA, 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, contingent upon PR RNO obtaining and filing with the Commission as compliance items, if not already included in the filing, permits, licenses, and approvals that are described below. Staff further recommends that the Commission's order contain a provision that if PR RNO does not file with the Commission all the compliances set forth below within five years of the effective date of the order, then the order will be deemed to be vacated without further action by, or order of, the Commission.

Introduction

5. Q. Please provide a brief overview of the UEPA process.

A. UEPA applications are filed with the Commission and are noticed for comments and

or intervention. Once the noticing period ends, and if there is no intervention, then Staff will draft a briefing memorandum. In the memorandum, Staff will reference information that has been provided in an application and DR Responses. Staff's memorandum will state whether such information addresses: (1) the nature of the utility facility's probable effect on the environment, (2) the extent to which the facility is needed to ensure reliable utility service to customers in Nevada (if the facility emits greenhouse gases and does not use renewable energy as the primary source of energy to generate electricity), (3) whether the need for the facility balances any adverse effect on the environment, (4) whether the facility represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives, (5) whether a Surplus Asset Retirement Plan is needed, and (6) whether the facility will serve the public interest. Staff's memorandum—and the corresponding UEPA application—are set before the Commission for consideration during an Agenda. If the Commission grants a UEPA application—and there are still outstanding permits—then a Compliance order is issued. UEPA applicants have five years to file the outstanding permits in the corresponding docket. Once all the outstanding permits are filed for an entire project or a phase of the project, Staff will file a Compliance memorandum, asking that the Commission issue a Permit to Construct ("PTC") to the applicant.

6. Q. Does Staff conduct an independent environmental study?

A. No, UEPA applications include opinions of environmental professionals. Such opinions are usually in Environmental Statements ("ES") attached to UEPA applications. In this case, the ESs were prepared by Panorama Environmental, Inc.[1] Moreover, other agencies make determinations regarding UEPA projects. Here, three of the permits—required to be filed before the Commission issues a PTC—are from the Nevada Department of Environmental Protection ("NDEP"). If NDEP decides to

[1] The projects associated with these two dockets involve private land; no Federal land is involved therefore no Federal reviews such as Bureau of Land Management are required.

issue all three of the required permits, then Staff will accept and incorporate those decisions. Ultimately, Staff reviews UEPA applications (and DR Responses) to determine whether an application (and DR Responses) include information addressing: (1) the nature of the utility facility's probable effect on the environment, (2) the extent to which the facility is needed to ensure reliable utility service to customers in Nevada, (3) whether the need for the facility balances any adverse effect on the environment, (4) whether the facility represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives, (5) whether a Surplus Asset Retirement Plan is needed, and (6) whether the facility will serve the public interest.

7. Q. If a permit is issued from a federal, state, or local jurisdiction, then will Staff dispute that permit?

A. No, Staff will not dispute permits that a federal, state, or local jurisdiction issues.

8. Q. Has Staff recently reviewed a UEPA Application similar to the two projects discussed below?

A. Yes, Docket No. 25-08009; the Application of Sierra Pacific Power Company d/b/a NV Energy, under the provisions of the Utility Environmental Protection Act, for a permit to construct the 400 MW Valmy Capacity Project consisting of two 200 MW natural gas combustion turbines, an approximately 0.5-mile 345 kV transmission line, expansion of the North Valmy 345 kV substation, and associated facilities to be located on private land in Humboldt County, Nevada. Staff filed a briefing memo on November 12, 2025, and the Commission issued a Compliance order on November 20, 2025. Since the Compliance order was issued, Phases One, Two, and Four PTC have been issued to the Applicant and Phase three is still outstanding. There were no interventions or comments posted in the docket.

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I. Recommendation No. 1: SV RNO's request for a UEPA permit to construct the South Valley Temporary Power Generation Facility.

9. Q. Please summarize SV RNO's request for a UEPA 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.

A. SV RNO is proposing to construct a temporary 144 MW capable natural gas power generation system designed to supply electrical power exclusively for on-site consumption at the South Valley data center campus.[2] The generation facility comprises ninety (90) Jenbacher J420 natural gas-fueled engines (approximately 1.6 MW each), four (4) Volvo Penta Model TWD1683GE Tier 4 diesel-fueled black start engine gensets (1,370 kW each), forty (40) Liquefied Natural Gas ("LNG") holding tanks, two (2) dual-burner LNG vaporizers (26 MMBtu/hr each), fifty-three (53) medium voltage transformers, and ninety (90) selective catalytic reduction ("SCR") systems for Nitrogen Oxide ("NOx"), Carbon Monoxide ("CO"), and Volatile Organic Compounds ("VOC") control. The facility will be operated and maintained by Aggreko, LLC; LNG delivery, storage, and vaporizing operations will be managed by Stabilis. The power generated by this system will be non-grid connected and will provide electricity exclusively to the on-site data center ("SV RNO Project"). LNG delivery to the site will occur approximately 20 times per day during operations using a 24-hour delivery window. The SV RNO Project is situated on land identified by Storey County Assessor Parcel Numbers ("APNs") 004-171-25 and 004-171-30, with a Project address of 8990 USA Parkway, McCarran, Nevada 89437. The entire SV RNO Project area is privately owned and is situated within a Master Planned industrial park. A legal description of the proposed location for the SV RNO Project is provided in Attachment RMS-2.

[2] In its Application, on page 2 lines 18 through 22, SV RNO states it expects to operate the power generation facility for a period of two to three years.

10. Q. Did SV RNO's Application contain an ES?

A. Yes. The Application contains an ES prepared by Panorama Environmental, Inc. dated April 10, 2026.

11. Q. Did SV RNO's Application provide an estimated water usage for the SV RNO Project?

A. Yes. The Application states that the estimated volume of water consumed is 2.1 acre-feet. Construction activities will require water for dust suppression, concrete mixing, and worker sanitation. Water for both construction and operations will be provided by the TRI Center water main located along USA Parkway, managed and operated by the Tahoe-Reno Industrial General Improvement District ("TRI-GID").

12. Q. Will the SV RNO Project serve any other customers other than SV RNO?

A. No, SV RNO's Application states that the SV RNO Project will not provide utility service to any customers other than SV RNO. Furthermore, SV RNO's Response to Staff Data Request ("DR") 4 notes that the South Valley Temporary Power Generation Facility will not provide utility service to any customers; it is a self-generation facility designed to supply electrical power exclusively for on-site consumption at the South Valley data center campus.[3]

13. Q. Please provide an overview of Staff's review of SV RNO's Application.

A. Staff reviewed SV RNO's Application (and DR Responses) to determine whether the Application (and DR Responses) included information addressing: (1) the nature of the utility facility's probable effect on the environment, (2) the extent to which the facility is needed to ensure reliable utility service to customers in Nevada, (3) whether the need for the facility balances any adverse effect on the environment, (4) whether the facility represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives,

[3] *See* Attachment RMS-3 (SV RNO's Response to Staff DR 4).

(5) whether a Surplus Asset Retirement Plan is needed, and (6) whether the facility will serve the public interest.[4]

NRS 704.890(1)(a) (Environmental Effects): SV RNO's Application contains an ES that was prepared by Panorama Environmental, Inc. The ES contains analysis of existing conditions, potential impacts, and mitigation measures for each environmental resource category. SV RNO states that environmental impacts associated with the SV RNO Project are primarily temporary in nature, limited to the construction period, and manageable through implementation of the engineering controls, best management practices ("BMPs"), and permit conditions described in the ES. According to SV RNO's Application, operational impacts, including air emissions and noise, are within established regulatory thresholds as demonstrated by the air dispersion modeling analysis and noise impact assessment conducted for the SV RNO Project. Staff agrees that the aforementioned information indicates that the generating facility will be temporary.[5]

NRS 704.890(1)(b) (Greenhouse Gas Emissions/Effect on Reliability of Service): The SV RNO Project will emit greenhouse gases. However, SV RNO's Application states that the SV RNO Project is necessary to provide reliable electrical power to the South Valley data center campus during the period before NV Energy can deliver permanent utility service to the site.[6] SV RNO contends that data center

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[4] NRS 704.890(1) states: "Except as otherwise provided in subsection 3, the Commission may not grant a permit for the construction, operation and maintenance of a utility facility, either as proposed or as modified by the Commission, to a person unless it finds and determines: (a) The nature of the probable effect on the environment; (b) If the utility facility emits greenhouse gases and does not use renewable energy as its primary source of energy to generate electricity, the extent to which the facility is needed to ensure reliable utility service to customers in this State; (c) That the need for the facility balances any adverse effect on the environment; (d) That the facility represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives; (e) That the location of the facility as proposed conforms to applicable state and local laws and regulations issued thereunder and the applicant has obtained, or is in the process of obtaining, all other permits, licenses, registrations and approvals required by federal, state and local statutes, regulations and ordinances; (f) That the surplus asset retirement plan filed pursuant to NRS 704.870: (1) Complies with federal, state and local laws; (2) Provides for the remediation and reuse of the facility within a reasonable period; and (3) Is able to be reasonably completed under the funding plan contained in the application; and (g) That the facility will serve the public interest."

[5] During Staff's site visit, Staff saw signage placed at the South Valley data center showing 1,200 MW of utility power scoped. As SV RNO's Application is for 144 MW, this suggests that the SV RNO Project will be temporary.

[6] SV RNO's Application, page 13, lines 7-13.

growth in the TRI Center is outpacing the pace at which NV Energy can build permanent infrastructure to serve new large industrial loads. SV RNO also contends that, without the temporary power facility, SV RNO would be unable to activate and operate its data center, delaying a significant economic investment in Storey County and the broader Nevada economy. In response to Staff DR 5, SV RNO states:

> *"First, the Project defers 144 MW of load that would otherwise need to be served by NV Energy's system during a period of significant capacity constraint. Data center growth in the Tahoe-Reno Industrial Center is outpacing the pace at which NV Energy can construct permanent generation and transmission infrastructure to serve new large industrial loads. By meeting the Applicant's near-term power needs through on-site self-generation, the Project keeps 144 MW off the utility grid at precisely the time when NV Energy's system is under the greatest strain from rapid load growth. That load deferral preserves existing generation and transmission capacity for NV Energy's current customers, reducing the risk of reliability degradation that could result from adding large new loads to an already-constrained system.*
>
> *Second, the Project addresses a documented infrastructure pacing problem that itself poses a reliability risk. NV Energy has acknowledged that it cannot currently deliver permanent utility service to the South Valley data center campus. If the Applicant were forced to wait for permanent utility interconnection before commencing operations, the result would not simply be a delay; it would mean that when NV Energy's infrastructure does come online, a large block of pent-up demand would arrive on the system simultaneously rather than being phased in gradually. The Project enables an orderly transition by allowing the Applicant to begin operations now through self-generation and then migrate to permanent utility service incrementally as*

NV Energy's infrastructure becomes available. This phased approach avoids the reliability risks associated with sudden, large-scale load additions.

Third, the Project functions as a reliability bridge that ensures the Applicant's future utility load transfers to NV Energy's system in an orderly manner. The Applicant has applied for and is pursuing permanent utility interconnection. The Project is temporary by design; it will remain in operation only until NV Energy can deliver permanent service. When that transition occurs, the load will shift from self-generation to utility service under controlled conditions, supporting rather than straining system reliability."[7]

This information shows that the SV RNO Project will enable SV RNO to be able to begin operations of the South Vally Data Center until NV Energy can build the required infrastructure to reliably serve SV RNO and existing customers.[8]

NRS 704.890(1)(c) (Balancing Need and Environmental Effect): The Application and SV RNO's DR Responses provide information showing that the need for the SV RNO Project balances any adverse effects on the environment.[9] SV RNO contends that this temporary power system is required because data center growth is outpacing NV Energy's ability to supply power in new areas. The Application states that the SV RNO Project is expected to remain in operation for approximately two to three years until NV Energy can deliver permanent utility service to the site. Construction impacts will be primarily temporary, localized, and managed through implementation of BMPs and applicable permit conditions. Ground disturbance at the SV RNO Project area, which has been previously graded under existing permits, will be minor. Construction will generate temporary increases in air emissions from

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[7] *See* Attachment RMS-4 (SV RNO's Response to Staff DR 5).

[8] Staff DR 6 asks SV RNO, "[i]s the South Valley Temporary Power Generation Facility ('Project') needed to ensure reliable utility service to customers in Nevada?" SV RNO's Response is attached hereto as Attachment RMS-5 (SV RNO's Response to Staff DR 6).

[9] References to SV RNO and PR RNO's "Applications" include the exhibits that are attached to these "Applications." For example, the ES is one such exhibit.

equipment exhaust and fugitive dust, which will be managed through NDEP Surface Area Disturbance ("SAD") permit requirements. Temporary noise increases will occur during daytime construction hours. Stormwater will be managed pursuant to a Nevada Construction Stormwater Permit ("NPDES") and Stormwater Pollution Prevention Plan ("SWPPP"). Once construction is complete, the power generation facility will operate continuously during the two to three-year operational period. Operational impacts will include continuous noise from the generators, LNG delivery truck traffic (approximately 20 trips per day on a 24-hour basis), and air emissions managed under the NDEP Class I Operating Permit to Construct ("OPTC") air permit.

NRS 704.890(1)(d) (Minimum Adverse Effect-Mitigation): The ES explained that potential impacts will be reduced with the use of BMPs and mitigation measures. Some examples of the mitigation measures—explained in the ES (on pages 3-7, 3-8, 3-13, and 3-14)—include:

- **3.3.3 [Water Resources] Mitigation and Resource Protection Measures:** Water erosion and dust control measures will be incorporated during construction to mitigate potential impacts to surface water. The Applicant will obtain a NPDES permit and prepare a SWPPP for the Project. BMPs will be implemented to minimize erosion, sediment transport, and the potential discharge of pollutants during construction. Site-specific BMPs will be implemented by the contractor in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control will be implemented:
    - All site BMPs such as silt fencing, construction access controls, concrete washout devices, fuel secondary containment structures and other required measures will be in place during construction.
    - The weather will be monitored using National Weather Service reports during construction to track conditions and alert crews to the onset of significant rainfall events.
    - Non-active areas will be stabilized and revegetated as soon as feasible on those portions of the Project site where construction has temporarily or permanently ceased.
    - Covers will be placed over stockpiles prior to forecasted storm events and during windy conditions as necessary to prevent erosion of stockpiles. Sediment controls will be placed (such as fiber rolls, straw bales, silt fencing) around

the perimeter of stockpiled materials to control sediment runoff.
    - Controls will be repaired and reapplied according to BMPs in areas where erosion is evident.
- **3.4.3 [Air Quality] Mitigation Measures:** Wind erosion and dust control measures will be incorporated by construction crews to minimize potential impacts to air quality. The Project will comply with the requirements of the NDEP BAPC SAD permit, including implementation of site-specific BMPs fugitive dust emissions. As appropriate, the following practices for temporary and final erosion control will be implemented:
    - Vegetation removal and grading will be minimized to the extent practicable.
    - Water or dust palliatives will be applied to disturbed soil areas of the Project site to control dust and maintain optimum moisture levels for compaction as required by the NDEP BAPC SAD permit. Water will be applied using water trucks. Water application rates will be minimized as necessary to prevent runoff and ponding.
    - During windy conditions, including forecast or actual wind conditions of approximately 25 miles per hour or greater, dust control will be applied to haul roads to adequately control wind erosion. Exposed stockpiled material areas will be covered.
    - Excavation and grading will be temporarily suspended during periods of high winds when dust cannot be reasonably controlled.
    - All trucks hauling soil and other loose materials will be covered or at least 2 feet of freeboard will be maintained.
    - SCR systems would be installed on all Jenbacher engines and are subject to manufacturer emissions guarantees ensuring compliance with design emission limits over a minimum two-year operational period.
    - Diesel-powered equipment would be limited to Tier 4-compliant engines, which meet the most stringent federal emissions standards for non-road diesel engines and substantially reduce emissions of nitrogen oxides and particulate matter.
    - All diesel-powered equipment would operate on ultra-low sulfur diesel fuel, which minimizes sulfur dioxide emissions and supports optimal performance of diesel emission control systems.
    - Routine maintenance and operational monitoring would be implemented for all combustion sources to ensure continued performance of emission control systems and compliance with applicable air quality requirements throughout the operational life of the Project.

NRS 704.890(1)(e) (Other Permits): The Application notes that—in addition to the Commission's UEPA Permit to Construct—additional local permits, state permits, and approvals are required for the SV RNO Project. Prior to the issuance of the UEPA Permits to Construct, Staff recommends that SV RNO be ordered to file with the Commission the following, as compliance items, if not already included in the filing:

a) NDEP, Bureau of Air Pollution Control – Surface Area Disturbance Permit;
b) NDEP – Nevada Construction Stormwater Permit;
c) NDEP – Class 1 OPTC Air Permit; and
d) Storey County – Storey County Building Permit.

NRS 704.890(1)(f) (Surplus Asset Retirement Plan): SV RNO's Response to Nevadans for Clean Affordable Reliable Energy's ("NCARE") DR 2-5(a) explains that a surplus asset retirement plan is unnecessary.[10]

NRS 704.890(1)(g) (Public Interest): SV RNO's Application included information on how the SV RNO Project will serve the public interest. Specifically, the SV RNO Project will enable SV RNO to commence data center operations, representing a substantial capital investment in Storey County, Nevada. Construction of the SV RNO Project will generate temporary employment for qualified electrical, mechanical, and civil workers in the region, with a peak construction workforce of 20 workers and an average of 15 over a construction period of approximately six to eight months. Local businesses and suppliers within the region will benefit from construction spending. Long-term operations and maintenance of both the data center and associated utility infrastructure will produce sustained employment opportunities, property tax revenues for Storey County, and economic diversification consistent with the county's industrial growth strategy within the TRI Center. Additionally, the SV RNO Project will allow for additional time for NV Energy to build facilities that will eventually serve SV RNO.

[10] *See* Attachment RMS-6 (SV RNO's Response to NCARE DR 2-5(a)).

14. Q. Did SV RNO's Application address whether SV RNO investigated potential alternatives to the SV RNO Project?[11]

A. Yes. Potential alternatives for the SV RNO Project were evaluated to determine whether they could substantially achieve the SV RNO Project goals and objectives to be considered feasible and appropriate for further consideration. The primary purpose of the SV RNO Project is to provide reliable, onsite power generation to support the South Valley Data Center campus. Because the South Valley power generation facility is in the data center campus, and is centrally located to serve campus electrical demand, alternative locations either within or outside the South Valley property would not meet the operational objectives of the SV RNO Project. Relocating the facility would increase transmission distances, reduce system efficiency, and potentially require additional infrastructure, resulting in greater environmental disturbance and higher costs. The selected site is the most suitable location for the power generation facility within the South Valley property and minimizes potential environmental impacts. The facility is sited to minimize the length of interconnection facilities to the South Valley Substation and efficiently serve campus electrical demand. No feasible alternative locations or configurations were identified.

15. Q. What is your recommendation regarding SV RNO's request for a UEPA 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?

A. Staff recommends that the Commission find that SV RNO's ES identifies the nature of the probable effect of the SV RNO Project on the environment and the required mitigation measures. Staff further recommends that the Commission determine that SV RNO's Application (and various DR Responses) addresses: (a) the nature of the SV RNO Project's probable effect on the environment, (b) the extent to which the SV

[11] Again, references to SV RNO and PR RNO's "Applications" include the exhibits that are attached to these "Applications." For example, the ES is one such exhibit.

RNO Project is needed to ensure reliable utility service to customers in Nevada, (c) the need for the SV RNO Project balances any adverse effect on the environment, (d) the SV RNO Project represents the minimum adverse effect on the environment (considering the state of available technology and the nature and economics of the various alternatives), (e) the SV RNO Project's location—as proposed—conforms to applicable state and local laws and regulations and SV RNO has obtained, or is in the process of obtaining, all other permits, licenses, registrations and approvals required by federal, state, and local statutes, regulations, and ordinances, and (f) the SV RNO Project will serve the public interest. Staff further recommends that the Commission, based on these findings and determinations, issue an order approving the request of SV RNO under the provisions of the UEPA, for a permit to construct the SV RNO Project 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, contingent upon SV RNO obtaining and filing with the Commission as compliance items, if not already included in the filing, permits, licenses, and approvals that are described below.

1) NDEP, BAPC – Surface Area Disturbance Permit;
2) NDEP – Nevada Construction Stormwater Permit;
3) NDEP – Class 1 OPTC Air Permit; and
4) Storey County – Storey County Building Permit.

Staff further recommends that the Commission's order contain a provision that if SV RNO does not file with the Commission all the compliances set forth hereinabove within five years of the effective date of the order, then the order will be deemed to be vacated without further action by, or order of, the Commission.

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II. Recommendation No. 2: PR RNO's request for a UEPA permit to construct the Peru Ridge Self-Generation Project.

16. Q. Please summarize PR RNO's request for a UEPA 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.

A. PR RNO is proposing to construct a temporary 218 MW capable natural gas-fueled electric generating facility designed to supply electrical power exclusively for on-site consumption at the Peru Ridge data center facilities ("PR RNO Project").[12] The generating equipment includes 136 Jenbacher J420 natural gas-fueled generators (approximately 1.6 MW each, 218 MW total), six (6) Volvo Penta Model TWD1683GE Tier 4 diesel black start engine gensets, six 1,240-gallon diesel tanks, 72 medium voltage transformers, 136 SCR systems, and 176 mobile Compressed Natural Gas ("CNG") tanks for temporary storage, together with associated switchgear, protection equipment, control and relay enclosures, utility trenches, and all necessary appurtenances and devices. The PR RNO Project also includes natural gas fuel supply infrastructure, consisting of primary and secondary compression facilities for CNG delivered by truck. CNG is supplied by the fuel supply provider via dedicated trucking routes to the PR RNO Project site. The CNG would be transported to the site using mobile CNG containers and stored onsite until use. The fuel supply infrastructure includes compression and conditioning equipment necessary to supply natural gas to the generating units at the required pressure and flow rate. The PR RNO Project is a temporary generating facility intended to supply electrical power exclusively for on-site Consumption at the Peru Ridge data center campus. The PR RNO Project is located in Storey County, Nevada, within the TRI Center, approximately 22 miles east of the City of Reno. The TRI Center is a privately owned, master-planned industrial

[12] In its Application, on page 25 lines 8 through 11, PR RNO states it expects to operate the power generation facility for a period of two to three years.

park that encompasses thousands of acres of industrial land in the Truckee River Industrial Corridor. The Project site is situated on privately owned land, Storey County APN 005-011-94. A legal description of the proposed location for the PR RNO Project is provided in Attachment RMS-7 attached hereto.

17. Q. Did PR RNO's Application contain an ES?

A. Yes. The Application contains an ES prepared by Panorama Environmental, Inc. dated April 10, 2026.

18. Q. Did PR RNO's Application provide an estimated water usage for the PR RNO Project?

A. No. The Application did not provide an estimated volume of water consumed in acre-feet. PR RNO's Response to Staff DR 9, however, states "[t]he natural gas generators comprising the Peru Ridge Self-Generation Project do not consume water for operational purposes. There is no water usage associated with the generators. Any water use during the construction phase will be limited to dust control activities. Accordingly, the estimated water usage for this Project is zero acre-feet."[13] Furthermore, PR RNO's Application noted that construction activities will require water for dust suppression, concrete mixing (if any), and worker sanitation. Water for both construction and operational activities will be provided by the TRI Center water main located along the public roadway fronting the project site, managed and operated by TRI-GID.

19. Q. Will the PR RNO Project serve any other customers other than PR RNO?

A. No, PR RNO's Application states that the PR RNO Project is a temporary generating facility intended to supply electrical power exclusively for on-site consumption at the Peru Ridge data center campus. And, PR RNO's Response to Staff DR 11 states that the PR RNO Project will not provide utility service to any customers other than PR RNO.[14]

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[13] *See* Attachment RMS-8 (PR RNO's Response to Staff DR 9).
[14] *See* Attachment RMS-9 (PR RNO's Response to Staff DR 11).

20. Q. Please provide an overview of Staff's review of PR RNO's Application.

A. Staff reviewed PR RNO's Application (and DR Responses) to determine whether the Application (and DR Responses) included information addressing: (1) the nature of the utility facility's probable effect on the environment, (2) the extent to which the facility is needed to ensure reliable utility service to customers in Nevada, (3) whether the need for the facility balances any adverse effect on the environment, (4) whether the facility represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives, (5) whether a Surplus Asset Retirement Plan is needed, and (6) whether the facility will serve the public interest.[15]

NRS 704.890(1)(a) (Environmental Effects): PR RNO's Application contains an ES that was prepared by Panorama Environmental, Inc. The ES contains analysis of existing conditions, potential impacts, and mitigation measures for each environmental resource category. PR RNO states that environmental impacts associated with the PR RNO Project are primarily temporary in nature, limited to the construction period, and manageable through implementation of the engineering controls, BMPs, and permit conditions described in the ES. According to PR RNO's Application, operational impacts, including air emissions and noise, are within established regulatory thresholds as demonstrated by the air dispersion modeling analysis and noise impact assessment conducted for the PR RNO Project. Staff agrees

[15] NRS 704.890(1) states: "Except as otherwise provided in subsection 3, the Commission may not grant a permit for the construction, operation and maintenance of a utility facility, either as proposed or as modified by the Commission, to a person unless it finds and determines: (a) The nature of the probable effect on the environment; (b) If the utility facility emits greenhouse gases and does not use renewable energy as its primary source of energy to generate electricity, the extent to which the facility is needed to ensure reliable utility service to customers in this State; (c) That the need for the facility balances any adverse effect on the environment; (d) That the facility represents the minimum adverse effect on the environment, considering the state of available technology and the nature and economics of the various alternatives; (e) That the location of the facility as proposed conforms to applicable state and local laws and regulations issued thereunder and the applicant has obtained, or is in the process of obtaining, all other permits, licenses, registrations and approvals required by federal, state and local statutes, regulations and ordinances; (f) That the surplus asset retirement plan filed pursuant to NRS 704.870: (1) Complies with federal, state and local laws; (2) Provides for the remediation and reuse of the facility within a reasonable period; and (3) Is able to be reasonably completed under the funding plan contained in the application; and (g) That the facility will serve the public interest."

that the aforementioned information indicates that the generating facility will be temporary.[16] Additionally, PR RNO's Application states that ground disturbance at the project area, which has been previously graded under existing permits, will be minor. PR RNO's Application also notes that construction will generate temporary increases in air emissions from equipment exhaust and fugitive dust, which will be managed through NDEP SAD permit requirements including water application and dust palliatives. Temporary noise increases will occur during daytime construction hours. Stormwater will be managed pursuant to an NPDES Construction Stormwater Permit and SWPPP. PR RNO's Application states that once construction is complete, the power generation facility will operate continuously during the two-to-three-year operational period. Operational impacts will include continuous noise from the generators, CNG delivery truck traffic of approximately 20 trips per day on a 24-hour basis, and air emissions managed under the NDEP Class I OPTC air permit. Staff agrees that the aforementioned additional information also indicates that the generating facility will be temporary.

NRS 704.890(1)(b) (Greenhouse Gas Emissions/Effect on Reliability of Service): The PR RNO Project will emit greenhouse gases. However, PR RNO's Application states that the PR RNO Project is necessary to provide reliable electrical power to the Peru Ridge data center campus during the period before NV Energy can deliver permanent utility service to the site.[17] PR RNO contends that data center growth in the TRI Center is outpacing the pace at which NV Energy can build permanent infrastructure to serve new large industrial loads. PR RNO also contends that, without the temporary power facility, PR RNO would be unable to activate and operate its data center, delaying a significant economic investment in Storey County and the broader Nevada economy. In response to Staff DR 5, PR RNO states:[18]

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[16] During Staff's site visit, Staff saw signage placed at the Peru Ridge data center showing 1,000 MW of utility power scoped. As PR RNO's Application is for 218 MW, this suggests that the PR RNO Project will be temporary.

[17] PR RNO's Application, page 13, lines 5-19.

[18] *See* Attachment RMS-10 (PR RNO's Response to Staff DR 5).

"The Peru Ridge Self-Generation Project enhances the reliability of utility service in Nevada in several meaningful respects.

First, the Project defers 218 MW of load that would otherwise need to be served by NV Energy's system during a period of significant capacity constraint. Data center growth in the Tahoe-Reno Industrial Center is outpacing the speed at which NV Energy can construct permanent generation and transmission infrastructure to serve new large industrial loads. By meeting the Applicant's near-term power needs through on-site self-generation, the Project keeps 218 MW off the utility grid at precisely the time when NV Energy's system is under strain from rapid load growth. That load deferral avoids adding 218 MW to an already-constrained system during the interim period.

Second, the Project addresses a documented infrastructure pacing problem that itself poses a reliability risk. NV Energy has acknowledged that it cannot currently deliver permanent utility service to the Peru Ridge data center campus. If the Applicant were forced to wait for permanent utility interconnection before commencing operations, the result would not simply be a delay; it would mean that when NV Energy's infrastructure does come online, a large block of pent-up demand would arrive on the system simultaneously rather than being phased in gradually. The Project enables an orderly transition by allowing the Applicant to begin operations now through self-generation and then migrate to permanent utility service incrementally as NV Energy's infrastructure becomes available. This phased approach avoids the reliability risks associated with sudden, large-scale load additions.

Third, the Project functions as a reliability bridge that ensures the Applicant's future utility load transfers to NV Energy's system in an orderly manner. The Applicant has applied for and is pursuing permanent utility interconnection. The Project is temporary by design; it will remain in

operation only until NV Energy can deliver permanent service. When that transition occurs, the load will shift from self-generation to utility service under controlled conditions, supporting rather than straining system reliability."

This information shows that the PR RNO Project will enable PR RNO to be able to begin operations of the Peru Ridge data center until NV Energy can build the required infrastructure to reliably serve PR RNO and existing customers.[19]

NRS 704.890(1)(c) (Balancing Need and Environmental Effect): The Application and PR RNO's DR Responses provide information showing that the need for the PR RNO Project balances any adverse effects on the environment.[20] PR RNO contends that this temporary power system is required because data center growth is outpacing NV Energy's ability to supply power in new areas. The Application states that the PR RNO Project is expected to remain in operation for approximately two to three years until NV Energy can deliver permanent utility service to the site. Construction impacts will be primarily temporary, localized, and managed through implementation of BMPs and applicable permit conditions. Ground disturbance at the PR RNO Project area, which has been previously graded under existing permits, will be minor. Construction will generate temporary increases in air emissions from equipment exhaust and fugitive dust, which will be managed through NDEP SAD permit requirements. Temporary noise increases will occur during daytime construction hours. Stormwater will be managed pursuant to an NPDES Construction Stormwater Permit and SWPPP. Once construction is complete, the power generation facility will operate continuously during the two-to-three-year operational period. Operational impacts will include continuous noise from the generators, CNG delivery

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[19] Staff DR 6 asks PR RNO, "[i]s the Peru Ridge Self-Generation Project ('Project') needed to ensure reliable utility service to customers in Nevada?" PR RNO's Response is attached hereto as Attachment RMS-11 (PR RNO's Response to Staff DR 6).

[20] Again, references to PR RNO and SV RNO's "Applications" include the exhibits that are attached to these "Applications." For example, the ES is one such exhibit.

truck traffic (approximately 20 trips per day on a 24-hour basis), and air emissions managed under the NDEP Class I OPTC air permit.

NRS 704.890(1)(d) (Minimum Adverse Effect-Mitigation): The ES explained that potential impacts will be reduced with the use of BMPs and mitigation measures. Some examples of the mitigation measures—explained in the ES (on pages 3-7, 3-8, 3-13, and 3-14)—include:

- **3.3.3 [Water Resources] Mitigation and Resource Protection Measures:** Water erosion and dust-control measures will be incorporated during construction to mitigate potential impacts to surface water. A Nevada Construction Stormwater Permit will be required by NDEP and includes the development of a SWPPP to manage the discharge of pollutants from construction activities and thereby protecting water quality by minimizing sediment and debris from entering waterways. Key components of the SWPPP include identification of potential pollutants from the site, documentation of any spills and leaks and a plan for preventing and responding to spills. Site-specific BMPs will be implemented by the contractor in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control will be implemented:
    - All site BMPs such as silt fencing, construction access controls, concrete washout devices, fuel secondary containment structures and other required measures will be in place during construction.
    - The weather will be monitored using National Weather Service reports during construction to track conditions and alert crews to the onset of significant rainfall events.
    - Non-active areas will be stabilized and revegetated as soon as feasible on those portions of the Project site where construction has temporarily or permanently ceased.
    - Covers will be placed over stockpiles prior to forecasted storm events and during windy conditions as necessary to prevent erosion of stockpiles. Sediment controls will be placed (such as fiber rolls, straw bales, silt fencing) around the perimeter of stockpiled materials to control sediment runoff.
    - Controls will be repaired and reapplied according to BMPs in areas where erosion is evident.
- **3.4.3 [Air Quality] Mitigation Measures:** Wind erosion and dust-control measures will be incorporated by construction crews to minimize potential impacts to air quality. A SAD permit would be required by the NDEP

BAPC to control dust and prevent particulate matter from becoming airborne, since the Project requires more than five acres of disturbance. Site-specific BMPs will be implemented in compliance with regulations and permit conditions. As appropriate, the following practices for temporary and final erosion control will be implemented:

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

NRS 704.890(1)(e) (Other Permits): The Application notes that—in addition to the Commission's UEPA Permit to Construct—additional local permits, state permits, and approvals are required for the PR RNO Project. Prior to the issuance of the UEPA Permits to Construct, Staff recommends that PR RNO be ordered to file with the Commission the following, as compliance items, if not already included in the filing:

a) NDEP, BAPC – Surface Area Disturbance Permit;
b) NDEP – Nevada Construction Stormwater Permit;
c) NDEP – Class 1 OPTC Air Permit; and
d) Storey County– Storey County Building Permit.

NRS 704.890(1)(f) (Surplus Asset Retirement Plan): PR RNO's Response to NCARE DR 2-4(a) explains that a surplus asset retirement plan is unnecessary.[21]

NRS 704.890(1)(g) (Public Interest): PR RNO's Application included information on how the PR RNO Project will serve the public interest. Specifically,

[21] *See* Attachment RMS-12 (PR RNO's Response to NCARE DR 2-4(a)).

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

21. Q. Did PR RNO's Application address whether PR RNO investigated any potential alternatives to the PR RNO Project?[22]

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

[22] To repeat, references to PR RNO and SV RNO's "Applications" include the exhibits that are attached to these "Applications." For example, the ES is one such exhibit.

minimize the length of interconnection facilities to the Peru Ridge Substation and efficiently serve campus electrical demand. No feasible alternative locations or configurations were identified.

22. Q. What is your recommendation regarding PR RNO's request for a UEPA 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?

A. Staff recommends that the Commission find that PR RNO's ES identifies the nature of the probable effect of the PR RNO Project on the environment and the required mitigation measures. Staff further recommends that the Commission determine that PR RNO's Application (and various DR Responses) addresses: (a) the nature of the PR RNO Project's probable effect on the environment, (b) the extent to which the PR RNO Project is needed to ensure reliable utility service to customers in Nevada, (c) the need for the PR RNO Project balances any adverse effect on the environment, (d) the PR RNO Project represents the minimum adverse effect on the environment (considering the state of available technology and the nature and economics of the various alternatives), (e) the PR RNO Project's location—as proposed—conforms to applicable state and local laws and regulations and PR RNO has obtained, or is in the process of obtaining, all other permits, licenses, registrations and approvals required by federal, state, and local statutes, regulations, and ordinances, and (f) the PR RNO Project will serve the public interest. Staff further recommends that the Commission, based on these findings and determinations, issue an order approving the request of PR RNO under the provisions of the UEPA, for a permit to construct the PR RNO 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, contingent upon PR RNO obtaining and filing with the Commission as compliance items, if not already included in the filing, permits, licenses, and approvals that are described below.

1) NDEP, BAPC – Surface Area Disturbance Permit;
2) NDEP – Nevada Construction Stormwater Permit;
3) NDEP – Class 1 OPTC Air Permit; and
4) Storey County – Storey County Building Permit.

Staff further recommends that the Commission's order contain a provision that if PR RNO does not file with the Commission all the compliances set forth hereinabove within five years of the effective date of the order, then the order will be deemed to be vacated without further action by, or order of, the Commission.

Conclusion

23. Q. Please restate your recommendations.

A. I recommend that the Commission:

1) Find that SV RNO's ES identifies the nature of the probable effect of the South Valley Temporary Power Generation Facility on the environment and the required mitigation measures. Determine that SV RNO's Application (and various DR Responses) addresses: (a) the nature of the South Valley Temporary Power Generation Facility's probable effect on the environment, (b) the extent to which the South Valley Temporary Power Generation Facility is needed to ensure reliable utility service to customers in Nevada, (c) the need for the South Valley Temporary Power Generation Facility balances any adverse effect on the environment, (d) the South Valley Temporary Power Generation Facility represents the minimum adverse effect on the environment (considering the state of available technology and the nature and economics of the various alternatives), (e) the South Valley Temporary Power Generation Facility's location—as proposed—conforms to applicable state and local laws and regulations and SV RNO has obtained, or is in the process of obtaining, all other permits, licenses, registrations and approvals required by federal, state, and local statutes, regulations, and ordinances, and (f) the South Valley Temporary Power Generation Facility will serve the public interest. Based on these findings and determinations, approve the request of SV RNO under the

provisions of the UEPA, 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, contingent upon SV RNO obtaining and filing with the Commission as compliance items, if not already included in the filing, permits, licenses, and approvals that are described in the instant testimony. Staff further recommends that the Commission's order contain a provision that if SV RNO does not file with the Commission all the compliances described in the instant testimony within five years of the effective date of the order, then the order will be deemed to be vacated without further action by, or order of, the Commission.

2) Find that PR RNO's ES identifies the nature of the probable effect of the Peru Ridge Self-Generation Project on the environment and the required mitigation measures. Determine that PR RNO's Application (and various DR Responses) addresses: (a) the nature of the Peru Ridge Self-Generation Project's probable effect on the environment, (b) the extent to which the Peru Ridge Self-Generation Project is needed to ensure reliable utility service to customers in Nevada, (c) the need for the Peru Ridge Self-Generation Project balances any adverse effect on the environment, (d) the Peru Ridge Self-Generation Project represents the minimum adverse effect on the environment (considering the state of available technology and the nature and economics of the various alternatives), (e) the Peru Ridge Self-Generation Project's location—as proposed—conforms to applicable state and local laws and regulations and PR RNO has obtained, or is in the process of obtaining, all other permits, licenses, registrations and approvals required by federal, state, and local statutes, regulations, and ordinances, and (f) the Peru Ridge Self-Generation Project will serve the public interest. Based on these findings and determinations, approve the request of PR RNO under the provisions of the UEPA, 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, contingent upon PR RNO obtaining and filing with the Commission as compliance items, if not already included in the filing, permits, licenses, and approvals that are described in the instant testimony. Staff further recommends that the Commission's order contain a provision that if PR RNO does not file with the Commission all the compliances described in the instant testimony within five years of the effective date of the order, then the order will be deemed to be vacated without further action by, or order of, the Commission.

24. Q. Does this conclude your testimony?

A. Yes, it does.

Ryan M. Sinclair, P.E.
Statement of Qualifications

WORK HISTORY:

Public Utilities Commission of Nevada

Regulatory Engineer - June 2018 to Current

Perform comprehensive audits and inspections of utility plant investments such as generation facilities, new transmission and distribution facilities, and other plant records in the context of utility general rate case, Integrated Resource Plan applications and other regulatory filings. Review and processes Utility Environmental Protection Act ("UEPA") permits for renewable energy facilities, conventional power plants, and for transmission lines required to aid in the delivery of renewable energy and conventional energy. Participate in energy rulemaking/investigative Dockets needed to address energy issues within the state of Nevada

GENERAL ELECTRIC

Manufacturing/Factory Acceptance Technician - January 2008- June 2018

In this role I performed quality assurance testing on a wide variety of machine monitoring equipment. These tests include general quality, voltage and design checks along with Factory Acceptance Testing, which includes signal generate/path checks, modbus operations, power functionality and general monitoring checks along with schematic design changes and programmable logic changes. In this role, I worked daily with project managers, engineers, and customers to complete an array of projects.

EDUCATION AND PROFESSIONAL REGISTRATIONS:

Bachelor of Science in Electrical Engineering

Arizona State University – Degree Completed: December 2017

Professional Engineer-Electrical Engineering

State of Nevada Professional Engineer License #033208

PUCN Docket No. 26-04026
SV RNO Property Owner 1, LLC's Response to Staff Data Request Nos. 1-3
Dated: May 8, 2026

Request No: Staff - 1

Request Date: April 24, 2026

Requester: Sinclair

Responder:
Dallas Harris
Davison Van Cleve, P.C.
4675 W. Teco Ave., Suite 230
Las Vegas, NV 89118
Tel: (725) 735-1718
dah@dvclaw.com
Attorney for PR RNO Property Owner 1 LLC

Reference: Legal Description

Question:

Please provide an electronic copy (in Microsoft Word, paragraph form) of the legal description for the entire Project that SV RNO Property Owner 1 LLC would like contained in the Permit to Construct a Utility Facility, including metes and bounds if necessary.

RESPONSE CONFIDENTIAL? No.

Response to Staff - 1:

APN'S 004-171-25, 004-171-26, 004-171-27, 004-171-28, 004-171-30, 004-181-11 & 004-181-13 All that certain real property situate within a portion of Sections Thirty-three (33) and Thirty-four (34) of Township Nineteen (19) North, Range Twenty-three (23) East and Sections Three (3), Four (4), Five (5) Eight (8) and Nine (9) M.D.M., Storey County, State of Nevada, being all of Parcels 2024-01, 2024-02, 2024-03, 2024-05 and 2024-07 as shown on Map of Division Into Large Parcels File No. 139185, recorded on April 25, 2024 and Parcels 2024-15 and 2024-16 as described in Grant Bargain Sale Deed Document No. 139186, recorded on April 25, 2024, both filed in the Official Records of Storey County, Nevada, being more particularly described as follows: BEGINNING at the most easterly corner of said Parcel 2024-02 being on the southerly right-of-way of USA Parkway, Highway 439 and the County Line for Storey County and Lyon County; THENCE along said County Line South 28°30'44" West a distance of 11398.50 feet; THENCE the following Thirteen (13) courses and distances: 1. North 89°18'35" West a distance of 2444.05 feet; 2. North 89°32'14" West a distance of 1320.88 feet; 3. North 00°55'57" East a distance of 2632.66 feet; 4. South 89°20'21"

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SV RNO Property Owner 1, LLC's Response to Staff Data Request Nos. 1-3
Dated: May 8, 2026

East a distance of 1317.59 feet; 5. North 00°46'07" East a distance of 1318.45 feet; 6. North 89°15'34" West a distance of 1319.24 feet; 7. North 00°41'47" East a distance of 3831.99 feet; 8. South 89°14'21" East a distance of 1426.71 feet; 9. North 00°50'09" East a distance of 2625.12 feet; 10. South 89°20'30" East a distance of 2612.83 feet; 11. North 00°18'32" East a distance of 1311.60 feet; 12. South 89°23'28" East a distance of 2628.61 feet; 13. South 89°28'30" East a distance of 136.84 feet to said southerly right-of-way; THENCE along said southerly right-of-way South 49°25'20" East a distance of 1659.93 feet; THENCE 424.19 feet along the arc of a tangent 3750.00 foot radius curve to the left through a central angle of 06°28'52"; THENCE South 66°12'46" East a distance of 320.72 feet; THENCE South 60°50'43" East a distance of 411.13 feet to the POINT OF BEGINNING; Containing 1530.68 acres of land, more or less.

The proposed South Valley Temporary Power Generation Facility is located within the above-described property on Storey County APNs 004-171-25, 004-171-26, 004-171-27, 004-171-28, 004-171-30, 004-181-11, and 004-181-13, with a Project address of 8990 USA Parkway, McCarran, Nevada 89437. The power generation equipment footprint occupies approximately 37.4 acres within the South Valley data center campus (7.3 acres generation facility, 0.3 acres access road, and 29.8 acres laydown and staging areas).

PUCN Docket No. 26-04026
SV RNO Property Owner 1, LLC's Response to Staff Data Request Nos. 4-7
Dated: June 8, 2026

Request No: Staff - 4	**Request Date:** May 21, 2026
Requester: Sinclair	**Responder:** Dallas Harris Davison Van Cleve, P.C. 4675 W. Teco Ave., Suite 230 Las Vegas, NV 89118 Tel: (725) 735-1718 dah@dvclaw.com *Attorney for SV RNO Property Owner 1, LLC*

Reference: Application page 13, lines 5-19 (The Need to Ensure Reliable Service)

Question:

The Application's page 13, lines 5-19 discusses the need to ensure reliable service. Will the South Valley Temporary Power Generation Facility ("Project") provide utility service to any customers? If the answer is "yes," then:

(A) How many customers will the Project serve?

(B) Provide a detailed description of the utility service the Project will provide.

RESPONSE CONFIDENTIAL? No.

Response to Staff - 4:

No. The Project will not provide utility service to any customers. The South Valley Temporary Power Generation Facility is a self-generation facility designed to supply electrical power exclusively for on-site consumption at the South Valley data center campus.

Because the answer to this question is "no," subparts (A) and (B) are not applicable.

PUCN Docket No. 26-04026
SV RNO Property Owner 1, LLC's Response to Staff Data Request Nos. 4-7
Dated: June 8, 2026

Request No: Staff - 5	**Request Date:** May 21, 2026
Requester: Sinclair	**Responder:** Dallas Harris Davison Van Cleve, P.C. 4675 W. Teco Ave., Suite 230 Las Vegas, NV 89118 Tel: (725) 735-1718 dah@dvclaw.com *Attorney for SV RNO Property Owner 1, LLC*

Reference: Application page 13, lines 5-19 (The Need to Ensure Reliable Service)

Question:

The Application's page 13, lines 5-19 discusses the need to ensure reliable service. Please describe the extent to which the South Valley Temporary Power Generation Facility will enhance the reliability of utility service in Nevada.

RESPONSE CONFIDENTIAL? No.

Response to Staff - 5:

The South Valley Temporary Power Generation Facility enhances the reliability of utility service in Nevada in several meaningful respects.

First, the Project defers 144 MW of load that would otherwise need to be served by NV Energy's system during a period of significant capacity constraint. Data center growth in the Tahoe-Reno Industrial Center is outpacing the pace at which NV Energy can construct permanent generation and transmission infrastructure to serve new large industrial loads. By meeting the Applicant's near-term power needs through on-site self-generation, the Project keeps 144 MW off the utility grid at precisely the time when NV Energy's system is under the greatest strain from rapid load growth. That load deferral preserves existing generation and transmission capacity for NV Energy's current customers, reducing the risk of reliability degradation that could result from adding large new loads to an already-constrained system.

Second, the Project addresses a documented infrastructure pacing problem that itself poses a reliability risk. NV Energy has acknowledged that it cannot currently deliver permanent utility service to the South Valley data center campus. If the Applicant were forced to wait for permanent utility interconnection before commencing operations, the result would not simply be a delay; it would mean that when NV Energy's infrastructure does come online, a large block of pent-up demand would arrive on the system simultaneously rather than being phased in gradually. The Project enables an orderly transition by allowing the Applicant to begin operations now through self-generation and then migrate to permanent utility service

incrementally as NV Energy's infrastructure becomes available. This phased approach avoids the reliability risks associated with sudden, large-scale load additions.

Third, the Project functions as a reliability bridge that ensures the Applicant's future utility load transfers to NV Energy's system in an orderly manner. The Applicant has applied for and is pursuing permanent utility interconnection. The Project is temporary by design; it will remain in operation only until NV Energy can deliver permanent service. When that transition occurs, the load will shift from self-generation to utility service under controlled conditions, supporting rather than straining system reliability.

PUCN Docket No. 26-04026
SV RNO Property Owner 1, LLC's Response to Staff Data Request Nos. 4-7
Dated: June 8, 2026

Request No: Staff - 6	**Request Date:** May 21, 2026
Requester: Sinclair	**Responder:** Dallas Harris Davison Van Cleve, P.C. 4675 W. Teco Ave., Suite 230 Las Vegas, NV 89118 Tel: (725) 735-1718 dah@dvclaw.com *Attorney for SV RNO Property Owner 1, LLC*

Reference: Application page 13, lines 5-19 (The Need to Ensure Reliable Service)

Question:

The Application's page 13, lines 5-19 discusses the need to ensure reliable service. Is the South Valley Temporary Power Generation Facility ("Project") needed to ensure reliable utility service to customers in Nevada? If the answer is "yes," then:

(A) Provide a detailed explanation of why the Project is needed to ensure reliable utility service to customers in Nevada;

(B) Provide a detailed description of the extent to which the Project is needed to ensure reliable utility service to customers in Nevada; and

(C) Provide a detailed description of how the Project will ensure reliable utility service to customers in Nevada.

RESPONSE CONFIDENTIAL? No.

Response to Staff - 6:

Yes. The Project is needed to ensure reliable utility service to customers in Nevada. While the South Valley Temporary Power Generation Facility is a self-generation facility that will supply electrical power exclusively for on-site consumption at the Applicant's data center campus, the Project directly supports the reliability of utility service to NV Energy's customers by deferring a 144 MW load that NV Energy's system cannot currently serve. Absent the Project, the Applicant's power needs would fall on an already-constrained utility system, creating reliability risks for existing customers. The Project prevents that outcome.

(A) The Project is needed to ensure reliable utility service for three reasons. First, NV Energy cannot currently deliver permanent utility service to the South Valley data center campus. Data center growth in the Tahoe-Reno Industrial Center has outpaced the pace at which NV Energy can construct permanent generation and transmission infrastructure to serve new large industrial loads. If the Applicant were required to draw 144 MW from the utility grid before that infrastructure is in place, the result would be increased strain on NV Energy's existing generation

and transmission resources, degrading reliability for current customers. The Project eliminates that strain by meeting the Applicant's power needs through on-site self-generation during the interim period. Second, the Project avoids the reliability risks that would accompany a sudden, large-scale load addition. Without the Project, the Applicant's full load demand would arrive on NV Energy's system as a single block when permanent infrastructure becomes available, rather than transitioning in a controlled, phased manner. The Project enables that orderly transition. Third, the Project is temporary by design; it will operate only until NV Energy can deliver permanent service, at which point the Applicant's load will migrate to the utility system under conditions that NV Energy has had time to plan for and accommodate.

(B) The Project defers 144 MW of load from NV Energy's system during a period of documented capacity constraint. That 144 MW represents a significant share of the new industrial load seeking service in the Tahoe-Reno Industrial Center. By keeping that load off the grid until permanent infrastructure is ready, the Project preserves existing generation and transmission capacity for NV Energy's current customers. The extent of the reliability benefit is proportional to the load deferred: 144 MW of generation capacity that NV Energy does not need to supply, dispatch, or deliver during the interim period.

(C) The Project ensures reliable utility service to NV Energy's customers by operating as a self-contained generation facility that requires no utility resources to serve the Applicant's load during the interim period. The system includes redundancy features such as four diesel-fueled black start engine gensets and has been designed in accordance with applicable industry standard. Because the Project is fully self-sufficient, it places no demand on NV Energy's generation, transmission, or distribution infrastructure, ensuring that those resources remain available to serve existing utility customers reliably.

PUCN Docket No. 26-04026 and 26-04027
Response to NCARE Data Request Nos. 2-1 through 2-23

Dated: June 25, 2026

Request No: NCARE 2-5 **Request Date:** June 22, 2026

Requester: Zoe Harrold **Responder:** Curt Ledford

Question:

Regarding equipment removal and project close.

a) Explain why the Application did not provide a surplus asset retirement plan pursuant to NRS 704.870.

b) Provide in detail, the Applicant plan for equipment removal after the proposed operating duration and include a Project removal timeline.

c) Provide whether SV RNO PROPERTY OWNER 1, LLC has a financial plan or reserve to cover the costs of removing the Project equipment regardless of data center tenancy and if so, provide a summary of the plan.

d) Specify what equipment, if any, would remain at the Project site.

e) Please provide any Project removal impact assessments completed, including but not limited to impacts reported in Exhibit F, such as traffic, truck usage, emissions and dust abatement, and noise.

f) Please provide any post-Project restoration plans.

RESPONSE CONFIDENTIAL? No

Response and Objection to NCARE 2-5:

a) NRS 704.870 requires electric utilities to submit a surplus asset retirement plan for surplus utility assets. Applicants are not electric utilities, and the Project equipment does not constitute "surplus" within the meaning of NRS 704.734. Accordingly, NRS 704.870 is inapplicable to Applicants and the premise of subpart (a) does not apply.

b) The Aggreko generation equipment is designed for mobility and can be removed by connecting it to standard semi-trailer transport. No construction permits are anticipated to be necessary for removal of the generation equipment from the site.

PUCN Docket No. 26-04026 and 26-04027
Response to NCARE Data Request Nos. 2-1 through 2-23

Dated: June 25, 2026

c) NCARE 2-5(c) asks whether the respective Applicant "has a financial plan or reserve to cover the costs of removing the Project equipment regardless of data center tenancy and if so, provide a summary of the plan."

Applicants object to this subpart on the grounds that responsive information, to the extent it exists, constitutes confidential commercial and trade secret information. Internal financial planning documents, asset reserve arrangements, and decommissioning financing strategies are proprietary business information not available to the public. Disclosure of this information could cause substantial harm to the competitive and financial positioning of Applicants. Applicants are private actors not otherwise regulated by this Commission. Parties to this proceeding should not be able to use the requirement to file for a UEPA permit for a privately-operated facility as a vehicle for obtaining privileged or confidential financial information that would otherwise be unavailable. A private party subject to UEPA must have confidence that it can protect its commercially sensitive information from public disclosure accordingly. NCARE 2-5(c) therefore exceeds the permissible scope of NAC 703.680. To the extent responsive documents exist, they constitute confidential, proprietary, and trade secret information whose disclosure could harm Applicants.

d) The Tier 4 diesel backup generators and associated emission controls serving the data center will remain at the Project site as permanent equipment. All other generation equipment will be removed. See also Response to NCARE 2-2.

e) No removal impact assessments have been completed at this time. As noted above, the generation equipment is mobile and removal is not anticipated to require permits. Environmental conditions will be assessed at the time of removal and any applicable regulatory requirements will be met at that time. Applicants object to subpart (e) to the extent it seeks traffic, truck, and emissions analyses related to equipment removal, on the grounds that such matters are outside the scope of this proceeding. The UEPA permit criteria under NRS 704.890(1) require the Commission to evaluate the environmental impact of the generation facility's construction and operation, not the logistics of its future removal.

f) Applicants object to subpart (f) on the grounds that post-project restoration plans are outside the scope of this proceeding. Restoration plans are not among the factors the Commission is required to evaluate under NRS 704.890(1). No post-project restoration plan has been prepared.

PUCN Docket No. 26-04027
PR RNO Property Owner 1, LLC's Response to Staff Data Request No. 1-3
Dated: May 8, 2026

Request No: Staff - 1

Request Date: April 24, 2026

Requester: Sinclair

Responder:
Dallas Harris
Davison Van Cleve, P.C.
4675 W. Teco Ave., Suite 230
Las Vegas, NV 89118
Tel: (725) 735-1718
dah@dvclaw.com
Attorney for PR RNO Property Owner 1 LLC

Reference: Legal Description

Question:

Please provide an electronic copy (in Microsoft Word, paragraph form) of the legal description for the entire Project that PR RNO Property Owner 1, LLC would like contained in the Permit to Construct a Utility Facility, including metes and bounds if necessary.

RESPONSE CONFIDENTIAL? No.

Response to Staff - 1:

Parcel 5: 005-011-94 Parcel 2018-10 of Record of Survey Map No. 127133, filed in the Office of the County Recorder of Storey County, State of Nevada on January 25, 2018 as File No. 127133, of Official Records, being more particularly described as follows: All that certain parcel situate within a portion of the East 1/2 of Section Ten (10), Township Nineteen (19) North, Range Twenty-Two (22) East, M.D.M., Storey County, Nevada being portions of Parcel 2017-68 as shown on Record of Survey Map File No. 127014, Parcel 2017-22 as shown on Record of Survey Map, File No. 126523, Parcel 2015-18 as shown on Record of Survey Map File No. 122164 and Parcel 2007-130 as shown on Record of Survey map, File No. 107999, all in the Official Records of Storey County, Nevada and being more particularly described as follows: Beginning at the Southwest corner of said Section 10, being the Southwest corner of said Parcel 2015-18; Thence along the Westerly line of said Parcel 2015-18, North 00°46'16" East, 3879.61 feet; thence leaving said Westerly line, North 55°03'19" East, 1064.45 feet to the beginning of a non-tangent curve to the right, from which the radius bears South 23°00'34" East; Thence 132.03 feet along the arc of an 84.24 foot radius curve, through a central angle of 89°47'48"; Thence South 22°37'39" East, 640.51 feet to the Southerly line of said Parcel

PUCN Docket No. 26-04027
PR RNO Property Owner 1, LLC's Response to Staff Data Request No. 1-3
Dated: May 8, 2026

2017-22; Thence along said Southerly line, North 33°54'43" East, 880.65 feet to the Southeast corner of said Parcel 2017-22, being the Northeast corner of said Parcel 2015-19, also being on the Westerly right-of-way line of Peru Drive, as dedicated in Document No. 110592, also being the beginning of a non-tangent curve to the left, from which the radius bears North 81°48'54" East; Thence along said Westerly right-of-way line, 608.863 feet along the arc of a 870.00 foot radius curve, through a central angle of 40°40'57" to a point of reverse curvature; Thence 124.49 feet along the arc of a 770.00 foot radius curve to the right, through a central angle of 09°15'48"; Thence leaving said Westerly right-of-way line along the Southerly line of said Parcel 2017-68 the following five (5) courses and distances: South 67°22'11" West, 331.51 feet to the beginning of a curve to the right; 384.04 feet along the arc of a 855.00 foot radius curve, through a central angle of 23°19'23" to a point of reverse curvature; 95.96 feet along the arc of a 800.00 foot radius curve to the left, through a central angle of 06°52'21"; South 22°37'49" East, 1019.62 feet; and South 69°50'35" West, 1401.46 feet; Thence leaving said Southerly line, South 13°59'54" West, 512.00 feet to the beginning of a curve to the left; Thence 735.05 feet along the arc of a 2027.50 foot radius curve, through a central angle of 20°46'19"; Thence South 06°46'25" East, 468.26 feet to the beginning of a curve to the right; Thence 18.69 feet along the arc of a 20.25 foot radius curve, through a central angle of 52°52'23" to a point of reverse curvature; Thence 215.64 feet along the arc of a 60.00 foot radius curve, through a central angle of 205°55'06"; Thence South 35°48'50" East, 316.01 feet; Thence South 66°41'50" East, 254.03 feet; Thence South 87°32'11" East, 516.47 feet; Thence South 20°54'15" West, 110.67 feet to the Southerly line of said Parcel 2015-18; Thence along said Southerly line, South 26°48'57" West, 118.91 feet; Thence continuing along said Southerly line, North 89°20'18" West, 1293.84 feet to the point of beginning. (Pursuant to NRS 111.312, the above legal description previously appeared in that certain Deed, recorded February 7, 2018, as Instrument No. 127221 of Official Records)

The proposed Peru Ridge Self-Generation Project is located within the above-described property on Storey County APN 005-011-94, accessible via Peru Drive. The generation equipment footprint occupies approximately 23.4 acres (16.7 acres generation pad, 2.1 acres access road, and 4.6 acres laydown and staging areas).

PUCN Docket No. 26-04026 and 26-04027
Response to Staff Data Request Nos. 8 through 10

Dated: June 26, 2026

Request No: Staff 9 **Request Date:** June 3, 2026

Requester: Sinclair **Responder:** Curt Ledford

Question:

Please provide the estimated water usage for this project in acre-feet.

RESPONSE CONFIDENTIAL? No

Response to Staff 9:

The natural gas generators comprising the Peru Ridge Self-Generation Project do not consume water for operational purposes. There is no water usage associated with the generators. Any water use during the construction phase will be limited to dust control activities. Accordingly, the estimated water usage for this Project is zero acre-feet.

PUCN Docket No. 26-04026 and 26-04027
Response to Staff Data Request No. 11

Dated: June 30, 2026

Request No: Staff 11

Request Date: June 26, 2026

Requester: Sinclair

Responder: Curt Ledford

Question:

The Application's page 13, lines 5-19 discusses the need to ensure reliable service. Please confirm that the Peru Ridge Self-Generation Project ("Project") will NOT provide utility service to any customers. Staff notes that it propounded a similar Data Request ("DR") regarding the South Valley Temporary Power Generation Facility in Docket No. 26-04026 (i.e., Staff DR 4 in Docket No. 26-04026).

RESPONSE CONFIDENTIAL? No

Response to Staff 11:

Confirmed. The Peru Ridge Facility is not a public utility and is therefore not providing electric service to separate business entities at the Peru Ridge data center campus. This answer is intended to be consistent with the Applicant's response in Staff 1-4.

PUCN Docket No. 26-04027
PR RNO Property Owner 1, LLC's Response to Staff Data Request Nos. 5-7
Dated: June 8, 2026

Request No: Staff - 5	**Request Date:** May 21, 2026
Requester: Sinclair	**Responder:** Dallas Harris Davison Van Cleve, P.C. 4675 W. Teco Ave., Suite 230 Las Vegas, NV 89118 Tel: (725) 735-1718 dah@dvclaw.com *Attorney for PR RNO Property Owner 1, LLC*

Reference: Application page 13, lines 5-19 (The Need to Ensure Reliable Service)

Question:

The Application's page 13, lines 5-19 discusses the need to ensure reliable service. Please describe the extent to which the Peru Ridge Self-Generation Project will enhance the reliability of utility service in Nevada.

RESPONSE CONFIDENTIAL? No.

Response to Staff - 5:

The Peru Ridge Self-Generation Project enhances the reliability of utility service in Nevada in several meaningful respects.

First, the Project defers 218 MW of load that would otherwise need to be served by NV Energy's system during a period of significant capacity constraint. Data center growth in the Tahoe-Reno Industrial Center is outpacing the speed at which NV Energy can construct permanent generation and transmission infrastructure to serve new large industrial loads. By meeting the Applicant's near-term power needs through on-site self-generation, the Project keeps 218 MW off the utility grid at precisely the time when NV Energy's system is under strain from rapid load growth. That load deferral avoids adding 218 MW to an already-constrained system during the interim period..

Second, the Project addresses a documented infrastructure pacing problem that itself poses a reliability risk. NV Energy has acknowledged that it cannot currently deliver permanent utility service to the Peru Ridge data center campus. If the Applicant were forced to wait for permanent utility interconnection before commencing operations, the result would not simply be a delay; it would mean that when NV Energy's infrastructure does come online, a large block of pent-up demand would arrive on the system simultaneously rather than being phased in gradually. The Project enables an orderly transition by allowing the Applicant to begin operations now through self-generation and then migrate to permanent utility service incrementally as NV Energy's infrastructure becomes available. This phased approach avoids the reliability risks associated with sudden, large-scale load additions.

Third, the Project functions as a reliability bridge that ensures the Applicant's future utility load transfers to NV Energy's system in an orderly manner. The Applicant has applied for and is pursuing permanent utility interconnection. The Project is temporary by design; it will remain in operation only until NV Energy can deliver permanent service. When that transition occurs, the load will shift from self-generation to utility service under controlled conditions, supporting rather than straining system reliability.

PUCN Docket No. 26-04027
PR RNO Property Owner 1, LLC's Response to Staff Data Request Nos. 5-7
Dated: June 8, 2026

Request No: Staff - 6	**Request Date:** May 21, 2026
Requester: Sinclair	**Responder:** Dallas Harris Davison Van Cleve, P.C. 4675 W. Teco Ave., Suite 230 Las Vegas, NV 89118 Tel: (725) 735-1718 dah@dvclaw.com *Attorney for PR RNO Property Owner 1, LLC*

Reference: Application page 13, lines 5-19 (The Need to Ensure Reliable Service)

Question:

The Application's page 13, lines 5-19 discusses the need to ensure reliable service. Is the Peru Ridge Self-Generation Project ("Project") needed to ensure reliable utility service to customers in Nevada? If the answer is "yes," then:

(A) Provide a detailed explanation of why the Project is needed to ensure reliable utility service to customers in Nevada;

(B) Provide a detailed description of the extent to which the Project is needed to ensure reliable utility service to customers in Nevada; and

(C) Provide a detailed description of how the Project will ensure reliable utility service to customers in Nevada.

RESPONSE CONFIDENTIAL? No.

Response to Staff - 6:

Yes. The Project is needed to ensure reliable utility service to customers in Nevada. While the Peru Ridge Self-Generation Project is a self-generation facility that will supply electrical power exclusively for on-site consumption at the Applicant's data center campus, the Project directly supports the reliability of utility service to NV Energy's customers by deferring a 218 MW load that NV Energy's system cannot currently serve. Absent the Project, the Applicant's power needs would fall on an already-constrained utility system, creating reliability risks for existing customers. The Project prevents that outcome.

(A) The Project is needed to ensure reliable utility service for three reasons. First, NV Energy cannot currently deliver permanent utility service to the Peru Ridge data center campus. Data center growth in the Tahoe-Reno Industrial Center has outpaced the speed at which NV Energy can construct permanent generation and transmission infrastructure to serve new large industrial loads. If the Applicant were required to draw 218 MW from the utility grid before that infrastructure is in place, the result would be increased strain on NV Energy's existing generation

and transmission resources, degrading reliability for current customers. The Project eliminates that strain by meeting the Applicant's power needs through on-site self-generation during the interim period. Second, the Project avoids the reliability risks that would accompany a sudden, large-scale load addition. Without the Project, the Applicant's full load demand would arrive on NV Energy's system as a single block when permanent infrastructure becomes available, rather than transitioning in a controlled, phased manner. The Project enables that orderly transition. Third, the Project is temporary by design; it will operate only until NV Energy can deliver permanent service, at which point the Applicant's load will migrate to the utility system under conditions that NV Energy has had time to plan for and accommodate.

(B) The Project defers 218 MW of load from NV Energy's system during a period of documented capacity constraint. That 218 MW represents a significant share of the new industrial load seeking service in the Tahoe-Reno Industrial Center. By keeping that load off the grid until permanent infrastructure is ready, the Project preserves existing generation and transmission capacity for NV Energy's current customers. The extent of the reliability benefit is proportional to the load deferred: 218 MW of generation capacity that NV Energy does not need to supply, dispatch, or deliver during the interim period.

(C) The Project ensures reliable utility service to NV Energy's customers by operating as a self-contained generation facility that requires no utility resources to serve the Applicant's load during the interim period. The facility consists of a 218 MW natural gas generation system utilizing 136 Jenbacher J420 generators, operated and maintained by qualified technicians using established maintenance protocols. The system has been designed in accordance with applicable industry standards to ensure system reliability and power quality. Because the Project will operate independently of NV Energy’s system, it places no demand on NV Energy's generation, transmission, or distribution infrastructure, ensuring that those resources remain available to serve existing utility customers reliably.

PUCN Docket No. 26-04026 and 26-04027
Response to NCARE Data Request Nos. 2-1 through 2-23

Dated: June 25, 2026

Request No: NCARE 2-4

Request Date: June 22, 2026

Requester: Zoe Harrold

Responder: Curt Ledford

Question:

Regarding equipment removal and project close.

a) Explain why the Application did not provide a surplus asset retirement plan pursuant to NRS 704.870.

b) Provide in detail, the Applicant plan for equipment removal after the proposed operating duration and include a Project removal timeline.

c) Provide whether PR RNO PROPERTY OWNER 1, LLC has a financial plan or reserve to cover the costs of removing the Project equipment regardless of data center tenancy and if so, provide a summary of the plan.

d) Specify what equipment, if any, would remain at the Project site.

e) Please provide any Project removal impact assessments completed, including but not limited to impacts reported in Exhibit F, such as traffic, truck usage, emissions and dust abatement, and noise.

f) Please provide any post-Project restoration plans.

RESPONSE CONFIDENTIAL? No

Response and Objection to NCARE 2-4:

a) NRS 704.870 requires electric utilities to submit a surplus asset retirement plan for surplus utility assets. Applicants are not electric utilities, and the Project equipment does not constitute "surplus" within the meaning of NRS 704.734. Accordingly, NRS 704.870 is inapplicable to Applicants and the premise of subpart (a) does not apply.

b) The Aggreko generation equipment is designed for mobility and can be removed by connecting it to standard semi-trailer transport. No construction permits are anticipated to be necessary for removal of the generation equipment from the site.

PUCN Docket No. 26-04026 and 26-04027
Response to NCARE Data Request Nos. 2-1 through 2-23

Dated: June 25, 2026

c) NCARE 2-4(c) asks whether the respective Applicant "has a financial plan or reserve to cover the costs of removing the Project equipment regardless of data center tenancy and if so, provide a summary of the plan."

Applicants object to this subpart on the grounds that responsive information, to the extent it exists, constitutes confidential commercial and trade secret information. Internal financial planning documents, asset reserve arrangements, and decommissioning financing strategies are proprietary business information not available to the public. Disclosure of this information could cause substantial harm to the competitive and financial positioning of Applicants. Applicant's reason for the objection is grounded in the same reasoning as that for NCARE 1-2, and the objection to NCARE 1-2 is therefore incorporated herein. Applicants are private actors not otherwise regulated by this Commission. Parties to this proceeding should not be able to use the requirement to file for a UEPA permit for a privately-operated facility as a vehicle for obtaining privileged or confidential financial information that would otherwise be unavailable. A private party subject to UEPA must have confidence that it can protect its commercially sensitive information from public disclosure accordingly. NCARE 2-4(c) therefore exceeds the permissible scope of NAC 703.680. To the extent responsive documents exist, they constitute confidential, proprietary, and trade secret information whose disclosure could harm Applicants.

d) The Tier 4 diesel backup generators and associated emission controls serving the data center will remain at the Project site as permanent equipment. All other generation equipment will be removed. See also Response to NCARE 2-2.

e) Applicants object to subpart (e) to the extent it seeks traffic, truck, and emissions analyses related to equipment removal, on the grounds that such matters are outside the scope of this proceeding. The UEPA permit criteria under NRS 704.890(1) require the Commission to evaluate the environmental impact of the generation facility's construction and operation, not the logistics of its future removal. Applicant's reason for the objection is grounded in the same reasoning as that for NCARE 2-3 above, and the objection to NCARE 2-3 is therefore incorporated herein.

f) Applicants object to subpart (f) on the grounds that post-project restoration plans are outside the scope of this proceeding. Restoration plans are not among the factors the Commission is required to evaluate under NRS 704.890(1). No post-project restoration plan has been prepared. Applicant's reason for the objection is grounded

PUCN Docket No. 26-04026 and 26-04027
Response to NCARE Data Request Nos. 2-1 through 2-23

Dated: June 25, 2026

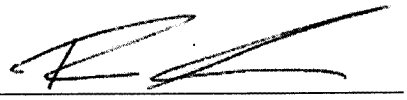
in the same reasoning as that for NCARE 2-3 above, and the objection to NCARE 2-3 is therefore incorporated herein.

AFFIRMATION

Pursuant to the requirements of NRS 53.045 and NAC 703.710, RYAN M. SINCLAIR, states that he is the person identified in the foregoing prepared testimony and/or exhibits; that such testimony and/or exhibits were prepared by or under the direction of said person; that the answers and/or information appearing therein are true to the best of his knowledge and belief; and that if asked the questions appearing therein, his answers thereto would, under oath, be the same.

I declare under penalty of perjury that the foregoing is true and correct.

Date: July 6, 2026



RYAN M. SINCLAIR