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**FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 6/30/2026**

NVEnergy

June 30, 2026

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

RE: Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for Approval of their Joint Expanded Solar Access Program Implementation Plan for plan period 2027-2029.

Dear Ms. Osborne:

Enclosed for filing with the Public Utilities Commission of Nevada ("Commission") please find the Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for Approval of their Joint Expanded Solar Access Program Implementation Plan for plan period 2027-2029. Also enclosed is a draft notice of the Application pursuant to NAC § 703.162.

Should you have any questions regarding this filing, please contact me at (702) 402-5794 or michelle.mcclure@nvenergy.com.

Respectfully submitted,

*/s/ Michelle A. McClure*
Michelle A. McClure
Senior Attorney

# APPLICATION

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

| | | |
|---|---|---|
| Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for Approval of their Joint Expanded Solar Access Program Implementation Plan for plan period 2027-2029. | ) ) ) ) / | Docket No. 26-06___ |

**APPLICATION**

Nevada Power Company d/b/a NV Energy ("Nevada Power") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra" and, together with Nevada Power, the "Companies" or "NV Energy,") submit this Application, pursuant to Nevada Revised Statute ("NRS") § 704.7865 for approval by the Public Utilities Commission of Nevada ("Commission") of their Expanded Solar Access Program Implementation Plan for Plan Period 2027-2029. The Companies agreed in their Stipulation with the Regulatory Operations Staff ("Staff") in Docket No. 25-11017 ("Stipulation"), to file their 2027-2029 ESAP by such a time in Program year 2026 so that the Commission will be able to issue its final order before the start of the 2027 Program year.[1]

NRS § 704.7865 requires that NV Energy prepare and file with the Commission an Expanded Solar Access Program ("ESAP") Implementation Plan ("Plan"). The Commission adopted ESAP regulations in Docket No. 19-06028, LCB File No. R136-20 (the "ESAP Regulations") that require the Companies to file an updated Plan every three years. During the 2025 Legislative Session, Assembly Bill 458 ("AB458") was passed resulting in the ESAP becoming available exclusively to low-income eligible customers. The Commission has initiated a rulemaking in Docket No. 25-07004 to, in part, implement Section 17 of AB458, which requires the Commission to adopt regulations to carry out the ESAP as amended. The proposed draft regulations reflect the primary goals of AB458 to (1) reorient the ESAP to exclusively serve low-income customers; and (2) prioritize grid resiliency and community

[1] Order, Docket No. 25-11017, February 25, 2026 at p. 4 of Attachment A.

benefits in siting Community Based Solar Resources ("CBSRs"), through an open request for proposals process.

Through this Application, NV Energy requests the Commission's approval, and acceptance of its Plan and budget for the plan period 2027-2029. NRS § 704.7865(4) requires that the Commission issue an order approving, with or without modifications, or denying the Plan within 210 days after its filing. The Companies request that the Commission resolve the matter prior to the commencement date of the ESAP Plan for 2027-2029 prior to January 1, 2027. Expedited resolution is in the public interest because it allows any applicant to commence receiving the benefits of the ESAP Plan upon the commencement date of the Plan with no delay.

## I.

## SUMMARY AND INTRODUCTION

NRS § 704.7865 previously required NV Energy to offer the ESAP to low-income customers, disadvantaged businesses, and eligible premise customers. AB458 revised the program to offer the ESAP to only low-income customers. The Plan is intended to offer these residential customers the opportunity to have their electric consumption be derived from a mix of utility-scale solar resources and CBSRs, without requiring that such customers install physical solar systems on their properties. The Plan sets forth: the customer application process; the criteria for CBSR site location, selection, and construction; the workforce innovations and opportunities program, developed by the Department of Employment, Training, and Rehabilitation ("DETR") in conjunction with potential employers and International Brotherhood of Electrical Workers ("IBEW"); the ESAP rate components and methodology; the ESAP Plan proposed budget; and the overall implementation of an ESAP program by the Companies.

## II.

## THE APPLICANTS

Nevada Power and Sierra are Nevada corporations and wholly-owned subsidiaries of NV Energy, Inc. Nevada Power and Sierra are public utilities as defined in NRS § 704.020, and are subject to the jurisdiction of the Commission. Nevada Power is engaged in providing electric service to the public in portions of Clark and Nye counties, Nevada pursuant to a certificate of public convenience and necessity issued by this Commission. Sierra provides electric service to the public in portions of fourteen northern Nevada counties, including the communities of Carson City, Minden, Gardnerville, Reno, Sparks, and Elko. Sierra owns and operates a certificated local distribution company engaged in the retail sale of natural gas to customers in the Reno-Sparks metropolitan area.

Sierra's primary business office is located at 6100 Neil Road in Reno, Nevada and Nevada Power's primary business office is located at 6226 West Sahara Avenue in Las Vegas, Nevada. All correspondence related to this Application should be served electronically upon the following address: regulatory@nvenergy.com. Hardcopy documents should be transmitted to NV Energy's counsel as set forth below:

Michelle A. McClure
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Las Vegas, NV 89151
Telephone: 702.402.5794
michelle.mcclure@nvenergy.com

Trevor Dillard
Director, Regulatory Services
6100 Neil Road
Reno, NV 89511
Telephone: 775.834.5823
regulatory@nvenergy.com

## III.

## APPLICATION EXHIBITS

NV Energy has included with this Application, and incorporated herein by reference, the following Application Exhibits:

• Application **Exhibit A** is a proposed notice of the Application as required by NAC § 703.162.

• Application **Exhibit B** is the Prepared Direct Testimony of Jared Bilberry.

• Application **Exhibit C** is a complete narrative version of the Expanded Solar Access Program Implementation Plan.

## IV.

## SUPPORTING MATERIAL

All material required to support the analysis and the requests for affirmative relief are set forth herein. A summary of this information, which references the Plan Narrative and appendices making up this filing, is set forth by general topic below.

**Section 1 – Executive Summary**. Provides an overview of the Companies' renewable energy efforts, the contents of AB458, the ESAP Regulations, the CBSR, and the contents of the Plan Narrative.

**Section 2 – Customer Enrollment Guidelines** Describes the objectives NV Energy followed in developing the Application, evaluation, and enrollment process for eligible customers in the Plan.

**Section 3 - Marketing Plan and Proposed Plan Budget.** Describes the marketing plan for the ESAP and the proposed $1,057,000 annual budget to implement the program.

**Section 4 – ESAP Energy Rate.** Describes the methodology for the ESAP Energy Rate that will be paid for by customers, including the discount for low-income, eligible customers.

**Section 5 – ESAP Public Policy Rate.** Describes the regulatory asset account, accounting and recovery of capital costs, and the ESAP Public Policy Rates which will be paid for by all customers of the Companies under section 16.4 of the ESAP Regulations.

**Section 6 - Portfolio Energy Credits**. Describes the treatment of the Portfolio Energy Credits that are derived from the ESAP.

**Section 7 – Community Based Solar Resources.** Describes the criteria for community involvement in the development of CBSR for the ESAP.

**Appendix A – Definitions.** Appendix A provides the definitions used in NRS § 704.7865, the ESAP Regulations and the Plan Narrative.

**Appendix B – Applications.** Appendix B is the customer application form, which will be used by customers to apply for the program.

**Appendix C – Proposed Budget Breakdown.** Appendix C is the breakdown of annual budget for the ESAP.

**Appendix D – ESAP Host Site Nomination Form.** Appendix D is the nomination form to be used by sponsors to nominate locations to be considered for a CBSR.

**Appendix E – Communities with Higher Levels of Low-Income Statement.** Appendix E provides instructions on how sponsors can provide information on whether their nominated site will be considered a site with higher levels of low-income customers.

**Appendix F – Statement of Support.** Appendix F is the statement of support to be used by sponsors for community based solar sites to nominate a location.

**Appendix G – Non-Binding Term Sheet for Exclusive Easement.** Appendix G is the nonbinding term sheet for an exclusive easement to be used for a community based solar site.

Additionally, this Application is supported by the following witness's prepared direct testimony:

**Jared Bilberry, Program Development Director.** Mr. Bilberry explains the Plan for the 2027-2029 period and continues the implementation plan currently in effect, as amended in Docket No. 22-06035 and Docket No. 25-11017.

## V.

## REQUEST FOR DEVIATION FROM REGULATION

NAC § 704.0097 provides that the Commission may allow deviation from any provision of NAC Section 704 if:

(1) Good cause for the deviation appears,

(2) The person requesting the deviation provides a specific reference to each provision of the chapter from which the deviation is requested, and

(3) The Commission finds that the deviation is in the public interest and is not contrary to statute.

Section 15.1 of the ESAP Regulations provides, in part, that:

> The expanded solar access program rate for all customers participating in the program must be calculated as 30 percent of the weighted average of the rates/or new utility-scale solar resources accepted by the Commission in an order pursuant to NRS 704. 751, as approved by the Commission, and community-based solar resources approved as part of the expanded solar access program plan, plus 70 percent of the base tariff energy rate, adjusted to remove the expanded solar access program resources and the deferred energy accounting adjustment. The expanded solar access program rate will replace a participating customer's base tariff energy rate and deferred energy accounting adjustment.

A. Deviation from the inclusion in the Base Tariff Energy Rate ("BTER") and Deferred Energy Accounting Adjustment ("DEAA")

The Companies interpret the language of Section 15.1 of the ESAP Regulations to require that for the ESAP participant BTER calculation any costs relating to community based solar resources and the DEAA will be removed. Seventy percent of the adjusted BTER rate will then be calculated to apply to ESAP customers. The Commission clarified that it is in the public interest to deviate from Section 15.1 of the ESAP Regulations and not require an adjustment to remove the ESAP resources at this time.[2]

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[2] Docket No. 22-03004, September 9, 2022, Order at Paragraph 58.

The Companies request a similar finding that it is in the public interest to deviate from the ESAP Regulations for the Plan in the same way. The Companies are requesting to continue to track the discount quarterly and to recover those costs through the ESAP Public Policy rate that will be spread to all customers, including Distribution Only Service customers. Such a finding more fairly addresses this cost and equally spreads those costs to all customers.

B. ESER

The Companies also request an additional deviation of Section 15.1 of the ESAP Regulations to allow the Companies to continue to exclude the costs associated with CBSRs from calculation of the 30 percent component of the ESER. The CBSRs currently in service are Company-owned assets whose depreciation and return are recovered through the ESAP Program Cost ("ESPC") and updated annually in the Deferred Energy Accounting Adjustment ("DEAA"). Because these costs are already recovered through the ESPC, including CBSR costs in the ESER would result in double recovery. Moreover, CBSRs do not have purchased-power costs associated with them and, therefore, cannot be readily incorporated into the weighted-average purchased-power based ESER calculation.[3]

[3] In its Order in Docket No. 20-12003, the Commission approved the Companies' 2021 ESAP Implementation Plan and noted that the 30 percent component of the initial ESAP rate should be calculated solely using the six utility-scale resources identified in the original ESAP Implementation Plan, and that no deviation from the regulations was required to support that methodology. August 11, 2021, Modified Final Order at para. 267. At that time, there were no approved CBSR resources, rates, or pricing that would have affected this determination. The Commission further observed that neither the governing statutes nor the regulations required the inclusion of CBSRs in establishing the ESER rate and agreed with Staff that such inclusion was not necessary. *Id.* The Companies continued this methodology in the 2024–2026 ESAP Implementation Plan filed in Docket No. 23-12003, which was approved by Commission Order dated May 21, 2024. In that proceeding, the ESER consisted of (i) 30 percent of the weighted average of qualifying utility-scale resource rates, consistent with prior Commission determinations, and (ii) 70 percent of the combined BTER and DEAA rates reflected in the Companies' quarterly deferred energy filings. The Commission further clarified in Docket No. 22-03004 that deviation from Section 15.1 was in the public interest to the extent necessary to exclude ESAP resources from the calculation. Order, August 30, 2022, Docket No. 22-03004 at paragraph 59. While this docket related to the approval of the cost recovery for the 2021 ESAP Program Plan, the Commission also considered the 30 percent weighted average and determined that Section 15(1) of the ESAP Regulations can be interpreted as requiring a rate for CBSRs only be included in the 30 percent weighted average if there are actual fuel or energy costs associated with any CBSRs.

A deviation is for good cause and in the public interest. While the Companies have evaluated alternative rate design methodologies for the ESER, such alternatives present significant practical and ratemaking challenges, including inconsistency with existing cost-recovery mechanisms, potential misalignment with purchased-power cost structures, and an increased risk of duplicative cost recovery. Additionally, CBSR-related expenditures are already recovered through the ESAP regulatory asset, and the Companies seek to avoid any duplication of recovery. The Companies will continue to monitor regulatory developments related to ESAP and will evaluate potential modifications to rate design as appropriate in future filings.

## VI.

## REQUESTS FOR RELIEF

NV Energy respectfully requests that pursuant to NRS § 704.7865 and the ESAP Regulations, the Commission issue an order accepting the Plan prior to the commencement date of the Plan for the 2027-2029 prior to January 1, 2027 and containing the following findings:

1. Accepting the Plan as it is set forth in Exhibit D to this Application,

2. Finding that this filing fully satisfies the reporting requirements of NRS § 704.7965 and the ESAP Regulations,

3. Approving the annual budget of $1,057,000,

4. Granting the two requests for deviation of Sections 15.1 of the draft regulations described above,

5. Granting all other requests as are specifically set forth in the exhibits filed herewith, those that are directly addressed and those that are not directly addressed in this Application, and

6. Granting any other relief as the Commission may deem appropriate and necessary.

Dated and respectfully submitted this 30th day of June, 2026.

NEVADA POWER COMPANY
D/B/A NV ENERGY

SIERRA PACIFIC POWER COMPANY
D/B/A/ NV ENERGY

*/s/Michelle A. McClure*
Michelle A. McClure
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Las Vegas, Nevada 89151
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# EXHIBIT A

# PROPOSED NOTICE

# Draft Notice for Applications, Petitions and Complaints

The Commission requires a draft notice be included with all applications, petitions and complaints. See Nevada Administrative Code 703.162. Please include one copy of this form with all the above filings.

I. Include a title that describes the relief requested, or proceeding scheduled pursuant to Nevada Administrative Code ("NAC") 703.160 (5)(a.)

**Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for Approval of their Joint Expanded Solar Access Program Implementation Plan for plan period 2027-2029.**

II. Include the name of the applicant, complainant, petitioner, or the name of the agent for same pursuant to NAC 703.160 (5)(b).

**Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy.**

III. Include a paragraph with a brief description of the purpose of the filing or proceeding with an introductory statement in plain English understandable to a person of average knowledge and intelligence, that summarizes the relief requested or proceeding scheduled, **AND** its impact upon consumers, pursuant to NAC 704.160 (5)(c).

**Nevada Power Company and Sierra Pacific Power Company are seeking approval of their Joint Expanded Solar Access Program Implementation Plan for the plan period 2027-2029. The Application requests that the Public Utilities Commission of Nevada approve the Plan, which addresses customer enrollment, a proposed annual budget, sets out the program rate and public policy rate for the program, as well as the community based solar resource selection criteria.**

IV. A declaration by the applicant, petitioner, or complainant whether a consumer session is required by Nevada Revised Statute ("NRS") 704.069 (1). NAC 703.162 (2)[1]

**A consumer session is not required pursuant to NRS 704.069.**

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

**Not applicable.**

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[1] **NRS 704.069 Commission required to conduct consumer session for certain rate cases; Commission required to conduct general consumer session annually in certain counties.**

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110, inclusive, in which:

(a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and

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

2. In addition to the case-specific consumer sessions required by subsection 1, the Commission shall, during each calendar year, conduct at least one general consumer session in the county with the largest population in this state and at least one general consumer session in the county with the second largest population in this state. At each general consumer session, the Commission shall solicit comments from the public on issues concerning public utilities. Not later than 60 days after each general consumer session, the Commission shall submit the record from the general consumer session to the Legislative Commission.

# EXHIBIT B

# PREPARED DIRECT TESTIMONY OF JARED BILBERRY

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

Nevada Power Company d/b/a NV Energy
Sierra Pacific Power Company d/b/a NV Energy

Joint Expanded Solar Access Program Implementation Plan Filing
Docket No. 26-06___

Prepared Direct Testimony of

**Jared Bilberry**

**1. Q. PLEASE STATE YOUR NAME, OCCUPATION, BUSINESS ADDRESS AND PARTY FOR WHOM YOU ARE FILING TESTIMONY.**

A. My name is Jared Bilberry. My current position is Program Development Director for Nevada Power Company d/b/a NV Energy ("Nevada Power") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra" and, together with Nevada Power, the "Companies" or "NV Energy"). My business address is 6226 W. Sahara Ave., Las Vegas, NV 89146. I am filing testimony on behalf of the Companies.

**2. Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND AND EXPERIENCE.**

A. Prior to my work at the Companies, I spent ten years with the Southern Nevada Water Authority ("SNWA") in the Water Conservation Division, where I supported the development and implementation of sustainable, efficient, and climate focused programs throughout Southern Nevada. Following my work at SNWA, I also worked in sustainability and regional planning within the transportation sector. **Exhibit Bilberry-Direct-1** provides a more detailed description of my background and industry experience.

**3. Q. WHAT ARE YOUR DUTIES IN YOUR CURRENT POSITION?**

A. My responsibilities as the Program Development Director include leading the Companies' clean energy programs and overseeing the development and scoping of the Renewable Portfolio Standard and its supplemental outlook, with the objective of supporting the Companies' transition toward 100 percent renewable energy.

**4. Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA ("COMMISSION")?**

A. No, I have not previously testified before the Commission.

**5. Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of my testimony is to sponsor the Companies' Expanded Solar Access Program ("ESAP") Implementation Plan for the period of 2027-2029 (the "Plan").

**6. Q. ARE YOU SPONSORING ANY EXHIBITS?**

A. Yes. I am sponsoring the following Exhibits:

| | |
|---|---|
| **Exhibit Bilberry-Direct-1** | Statement of Qualifications |
| **Exhibit C** | ESAP Complete Narrative Version of the ESAP Plan, including Appendices |

**7. Q. ARE THE COMPANIES SEEKING ANY SUBSTANTIVE CHANGES TO THE ESAP PLAN?**

A. Yes. The proposed Plan includes several substantive modifications to the ESAP. Specifically, the Plan removes the Income Eligible Premises and Disadvantaged Business categories and reallocates the associated program capacity to the

Low-Income customer category, consistent with legislative changes enacted in Assembly Bill 458 during the 2025 Legislative Session. In addition, the Plan transitions ESAP to a rolling, ongoing enrollment model for low-income customers to improve accessibility and ensure continuous program availability. These changes are intended to streamline program administration, focus resources on the customers with the greatest need, and enhance overall program performance. If further adjustments are required as future community-based solar resources are selected, the Companies will file an application to amend the Plan.

**8. Q. DOES THIS CONCLUDE YOUR PREPARED DIRECT TESTIMONY?**

A. Yes.

# EXHIBIT BILBERRY-DIRECT-1

**JARED BILBERRY**

**PROGRAM DEVELOPMENT DIRECTOR**

**ENERGY EFFECIENCY & CONSERVATION**

NV Energy

6226 West Sahara Avenue

Las Vegas, Nevada 89146

Mr. Bilberry has been the Program Development Director in the Renewables and Origination department at NV Energy for approximately four months. Prior to his current position, he spent over ten years with the Southern Nevada Water Authority in the Water Conservation Division, where he supported the development and implementation of sustainable and climate focused conservation programs throughout Southern Nevada. He also worked in sustainability and regional planning within the transportation sector. His current responsibilities include leading the Companies' clean energy programs and overseeing the development and scoping of the Renewable Portfolio Standard and its supplemental outlook to support the Companies' transition toward one hundred percent renewable energy.

## Employment History

**NV Energy**

January 2026 – Present

**Program Development Director, Energy Efficiency & Conservation**

January 2026 – Present

- Manage current renewable programs like the Expanded Solar Access Plan and the Nevada Green Rider.
- Work with customers to identify their renewable energy needs and develop programs in collaboration with other groups within the Companies to bring new programs before the Commission that will meet those needs.
- Oversee the development and scoping of the Renewable Portfolio Standard and its supplemental outlook, with the objective of supporting the Companies' transition toward 100 percent renewable energy.

## Non-NV Energy Employment

**Regional Transportation Commission**

June 2024 – February 2025

**Senior Regional Planner**

- Managed Projects – including those related to transportation, sustainability and underutilized land development – and collaborated with stakeholders to support the implementation of the Southern Nevada Strong (SNS) plan.
- Led electric vehicle infrastructure and transportation resiliency plans, supported regional grants and coordination, and further implemented the Metropolitan Planning Organizations' vision
- Analyzed data for regional planning studies, as well as for development briefings for agency leadership and elected officials.

**Southern Nevada Water Authority**

March 2013 – May 2024

**Conservation Research Analyst**

- Performed complex resource planning analyses associated with the water sector, utilizing various tools to communicate findings.
- Managed and analyzed demand data; using forecasting methods to translate internal and external data into insights
- Spearheaded remote sensing and GIS projects, including spatial, heat, and vulnerability analysis to help implement new policies and regulations.

## Education

**University of Nevada Las Vegas**

Bachelor of Arts – Economics, December 2022

AFFIRMATION

Pursuant to the requirements of NRS 53.045 and NAC 703.710, JARED BILBERRY, 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: June 30, 2026

Jared Bilberry

# EXHIBIT C

# EXPANDED SOLAR ACCESS PROGRAM IMPLEMENTATION PLAN

NVEnergy

# Expanded Solar Access Program
# Implementation Plan 2027

NVEnergy

**NEVADA POWER COMPANY D/B/A NV ENERGY**
**SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY**
**JOINT EXPANDED SOLAR ACCESS PROGRAM PLAN**
**2027 IMPLEMENTATION**

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## I. Executive Summary

The state of Nevada is a leader in sustainability and continues to be proactive in advancing measures and programs that embrace the development and deployment of renewable energy. To further Nevada's energy policy goals and objectives, the Nevada Legislature passed and enacted Assembly Bill 465 ("AB 465") in 2019, codified as Section 704.7865 in the Nevada Revised Statutes ("NRS"). NRS § 704.7865 directs regulated electric utilities to establish an Expanded Solar Access Program ("ESAP"). ESAP was intended to offer certain residential and non-residential customers the opportunity to have their electric bill be derived from a mix of utility-scale and community-based solar resources, without requiring that such customers install physical solar systems on their properties.

With the passage of Assembly Bill 458 ("AB 458") during the 2025 Legislative Session, the ESAP will become available exclusively to low-income eligible customers. The Commission has initiated a rulemaking in Docket No. 25-07004 to implement Section 17 of AB 458, which requires the Commission to adopt regulations to carry out the ESAP as amended. The proposed draft regulations reflect the primary goals of AB 458 to (1) reorient the ESAP to exclusively serve low-income customers; and (2) prioritize grid resiliency and community benefits in siting community-based solar resources ("CBSRs"), through an open request for proposals process.

Nevada Power Company d/b/a NV Energy ("Nevada Power") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra" and, together with Nevada Power, the "Companies" or "NV Energy") fully support the concept of ESAP as it provides eligible customers the opportunity to contribute toward a zero-emissions future. ESAP also allows the Companies to continue to make strides towards a fully renewable energy outlook by owning and operating CBSRs. These CBSRs will further support workforce innovations and influence economic development towards a brighter future for all Nevadans.

The Companies note that the additional application window to which the Companies agreed in the Stipulation with the Regulatory Operations Staff ("Staff") in Docket No. 25-11017 ("Stipulation"), remained open until May 31, 2026. The results of this window will not be available at the time of this filing; the Companies will submit an update containing those results once the information becomes available.

### A. Background

The Companies are vertically integrated electric and gas utilities based in Nevada. The Companies' service territories include population centers in the northern and southern parts of the state, cover nearly 46,000 square miles, and reach approximately 90 percent of the state's population. The Companies serve more than 1.6 million customers (approximately 1.45 million electric customers and 188,561 gas customers) across Nevada and have more than 2,600 employees. The Companies pride themselves on delivering exceptional service, ensuring customer reliability, and deploying low-cost and sustainable renewable energy resources.

The Companies' efforts in developing this ESAP Plan ("Plan") are consistent with their commitment to excellent service, reliability, public safety, and meeting renewable energy goals well into the future for all Nevadans.

In accordance with NRS § 704.7865 and pursuant to the regulations adopted by the Public Utilities Commission of Nevada ("Commission") in Docket No. 19-06028, LCB File No. R136-20 ("the ESAP Regulations"), which were codified in Chapter 704 of the Nevada Administrative Code, this Plan sets forth the Companies' strategy to continue this voluntary pricing program that will provide eligible customer groups opportunities to participate and utilize renewable energy sourced from a mixture of both community-based and utility-scale solar photovoltaic ("PV") facilities. The ESAP Regulations require that this Plan be filed triennially and the last filing was December 1, 2023.

This Plan incorporates all modifications approved by the Commission through the amendments to the 2024–2026 Joint Expanded Solar Access Program Implementation Plan—specifically, the First Amendment approved in Docket No. 25-01043 and the Second Amendment approved in Docket No. 25-11017. These amendments include updates to program administration, eligibility verification, CBSR operations, reporting requirements, and Expanded Solar Energy Rate ("ESER") related clarifications.

Beginning in 2027 and in accordance with the intent in AB 458, ESAP will serve only low-income eligible customers, and all ESAP capacity will be dedicated to this category. The disadvantaged business/income eligible premises categories will sunset at the end of 2026, and all remaining capacity previously allocated to these categories will be assigned to low-income customers. To support this transition, the Companies are conducting a second low-income enrollment period in 2026 as noted above and will provide sunset notices to customers in discontinued categories. These notifications will be sent to affected customers no later than two billing cycles before the close of the 2026 program year.

### B. AB 465 (2019) and AB 458 (2025)

AB 465 was enacted on June 4, 2019, and aimed to enact provisions that direct the Companies to implement a program that offers expanded solar access to certain eligible residential and non-residential customers. AB 465 allowed multiple customer classes the cost benefits of renewable energy who, for economic or other reasons, could not install their own private solar energy systems.

AB 458, enacted on June 6, 2025, amended the statutory provisions related to low-income access to renewable energy programs and emphasized the need to prioritize income-qualified households in utility program design. The Companies' proposal in this Plan is to limit ESAP participation to low-income eligible customers beginning in 2027, consistent with the policy direction established in AB 458.

The Plan, prepared and submitted by the Companies to implement the ESAP, requires, among other things, that the capacity of ESAP be below a certain amount with a set reserve, that ESAP broaden access to solar energy in an equitable manner, and that ESAP provide participating low-income residential customers with a guaranteed lower rate. Furthermore, AB 465 retained the

requirement that an electric utility, in implementing ESAP, to make use of a reasonable mixture of CBSRs and utility-scale solar resources.

C. Regulatory Overview

Per the ESAP Regulations, the Plan provides the following information:

- A list of actions for which the Companies are seeking approval of, including the approval of CBSRs and utility scale solar resources.
- A list of utility scale solar resources that are to be used in determining the ESAP rate.
- For CBSRs:
    - the criteria, which was developed with stakeholder input, that was used to create the initial list of non-contiguous locations and process for selection of final site locations; a schedule for the selection, construction and operation of the CBSR that takes into account the amount of energy that is expected to be subscribed and reservation amount that comports with requirements of NRS § 704.7865(2)(h);
    - information on how the Companies plan to compensate host sites; and
    - information on the workforce innovations and opportunities program, developed by the Department of Employment, Training, and Rehabilitation ("DETR") in conjunction with potential employers and International Brotherhood of Electrical Workers ("IBEW").
- A description of the application, enrollment, recertification, and disenrollment process for low-income customers under a rolling enrollment structure and selection process for eligible customers, including recertification, disenrollment, and/or relocation of participating customers.
- A plan for marketing ESAP and proposed annual budget.
- A description of ESAP rate components and methodology.
- A demonstration of consistency with AB 458's low-income access provisions.
- Integration of program administration and CBSR-related updates approved in Docket Nos. 25-01043 and 25-11017.

In accordance with the ESAP Regulations, the Companies propose and request that the Commission review this Plan and make determinations of prudence regarding each element of the Plan.

D. CBSR and Utility-Scale Solar Resources

Mohave High School was the first CBSR developed for Nevada Power customers and commenced operation on December 21, 2021. Freedom Park Solar and Moana Solar were included in the ESAP First Amendment, Docket No. 22-06035, and were approved by the Commission on October 26, 2022. Moana Solar commenced operation in December 2023, and Freedom Park Solar commenced operation in February 2024. Subsequently, the Commission granted approval of four additional CBSRs: UNLV Shadow Lane Solar, Lorenzi Park Solar, Washoe County Senior Center Solar and Carson City Public Works Solar. The UNLV Shadow Lane Solar is no longer proceeding as a CBSR because UNLV formally withdrew its application. The remaining three approved CBSRs—Lorenzi Park Solar, Washoe County Senior Center Solar, and Carson City Public Works Solar—

are currently under construction and are expected to commence operation in the first quarter of 2027. No additional CBSRs are proposed in this Plan. Any future CBSRs will be requested in a subsequent ESAP amendment application or triennial plan application.

There are no changes proposed to the following utility scale resources that were specified in Table 5 in the ESAP Status Report filed on March 1, 2023, in Docket No. 23-03001.

**Table 5**
**Utility Scale Solar Resources Information**

| Renewable Energy Projects | Contract Capacity (MW) | Generation Commenced |
|---|---|---|
| Dodge Flat | 200 | February 2022 |
| Fish Springs | 100 | February 2022 |
| Battle Mountain | 101 | May 2021 |
| Eagle Shadow Mountain | 300 | October 2021 |
| Copper Mountain 5 | 250 | March 2021 |
| Techren V | 50 | December 2020 |

The existing CBSR's and utility-scale solar resources are sufficient to meet expected ESAP demand during the 2027-2029 plan period, given the transition to a low-income-only program and the associated capacity reallocation.

E. Implementation of Plan and Submittal

The Commission shall review and approve the Plan, or require subsequent modifications, within 210 days of filing. However, the Companies request consideration and approval of this Plan no later than December 31, 2026 so that customers can have complete access to the new plan upon its commencement date of January 1, 2027.

This Plan serves as the outline for the continued implementation of ESAP and the Companies expect to submit an updated ESAP Plan upon selection of any additional CBSR host sites and execution of contracts for the host sites. When applicable, the Companies may file a joint plan, amendment, or update.

To support the transition to a low-income-only ESAP beginning January 1, 2027, the Companies held a second low-income enrollment period in 2026, running from April 1 to May 31. Advertising relating to the second low-income enrollment period began March 1, 2026. If applications exceed the Low-Income capacity limits in NRS 704.7865(a), the excess participation will be allocated unused capacity from the Eligible Premises and Disadvantaged Business categories. The Companies will also notify customers in the discontinued Disadvantaged Business and Eligible Premises categories that they will be removed from ESAP and returned to their applicable rate schedule effective January 1, 2027, with notice provided no later than two billing cycles before the end of the 2026 Program Year.

Beginning January 1, 2027, ESAP will operate under a rolling enrollment structure for low-income eligible customers. Customers may apply at any time, subject to available capacity. Recertification will occur on the anniversary of each customer's individual enrollment approval date, and customers will be advised at least two billing cycles prior to their recertification deadline.

In the interim, the Companies will file informational reports to the Commission no later than March 1st of every year upon the ESAP being effective. This annual informational report will contain the following information:

- Number of total customers
- Number of applications received
- Number of individuals that left program voluntarily
- Number of participants remaining in program
- Status of construction, maintenance and operation of community-based solar resources
- Energy production
- Subscribed energy
- Program-rate information
- Workforce statistics
- Customer calls

The Companies will track the information requested and will provide as much information as is available.

F. Total Energy Capacity and Reservation Amounts

NRS 704.7865(1) dictates that for ESAP, Nevada Power and Sierra shall not exceed a total annual amount of 240,000 megawatt-hours ("MWh") and 160,000 MWh, respectively. Beginning January 1, 2027, ESAP will serve only Low-Income Eligible Customers, consistent with the statutory direction of AB 458 and the program modifications approved in Docket Nos. 25-01043 and 25-11017. As a result, all ESAP capacity previously allocated to the Disadvantaged Business and Eligible Premises categories will be reassigned to the Low-Income Eligible Customer category.

The ESAP Regulations also specifically divide the total annual amount among the categories as shown in Table 1 below.

**Table 1: Nevada Power and Sierra ESAP Capacity Dedication**

| | ESAP Category | Dedicated Capacity |
|---|---|---|
| **Nevada Power** | Low-income Eligible Customer | 240,000 MWh |
| **Sierra** | Low-income Eligible Customer | 160,000 MWh |

Because the Companies want to ensure that the total annual amount of energy is not exceeded, the Companies expect to track a reservation amount to not exceed 10 percent, as allowed per the ESAP Regulations. To ensure that capacity maximums are not exceeded, the Companies will monitor capacity amounts.

To properly monitor the capacity amounts, the Companies will require any eligible premises to have a minimum of eight months' consumption history to allow for a more accurate average to be populated for eligible applicants. This will then serve as the capacity reservation for the ESAP year.

## II. Customer Enrollment and Guidelines

Per the ESAP Regulations, the ESAP plan year is expected to run from January 1 to December 31 of each calendar year. For 2026, the Companies will continue to follow the established schedule, including the additional low-income enrollment period in September. Pursuant to AB 458, beginning in 2027, the program will transition to a rolling, year-round application and review process consistent with the updated ESAP structure. The Companies propose the following schedule for ESAP as shown in Table 2.

**Table 2: ESAP Schedule**

| Action | Dates |
|---|---|
| Application Submittal Period | Accepted year-round |
| Application Review and Approval | Conducted on a rolling basis upon receipt of application |
| Selection Process | Conducted continuously as eligible applications are approved |
| Selection Results Communicated | Communicated to customers within 30 days of the close of the approval period |
| Program Effective Date[1] | Customer's next available billing cycle following selection |
| Informational Report Filing | Filed annually on March 1 |

[1] Program Effective Date will be the Nevada Power applicants' first billing cycle following January 1, 2025.

The Application Submittal, Application Review and Approval, Selection Process, Selection Results and Informational Report filing will continue to follow the established annual cycle through the 2026 plan year, consistent with ESAP Regulations. Beginning in 2027, these processes will shift to a rolling year-round structure aligned with the updated ESAP program design and regulatory requirements.

Customer Eligibility

In order to participate in ESAP, applicants must be fully bundled customers, must have a premises that has a minimum of eight months' consumption history, and must be located within the Companies' service territories. Applicants under the following categories may participate in ESAP regardless of whether they own, rent or lease the premises if eligibility requirements are met.

During the 2026 plan year, eligibility categories will continue to follow the ESAP Regulations in effect, including Low-Income Eligible Customers, Disadvantaged Businesses or Non-Profit Organizations, and Eligible Premises Customers. Beginning January 1, 2027, ESAP will transition to a low-income only program consistent with statutory requirements and approved program amendments.

The eligibility for low-income eligible customers requires applicants to demonstrate a household income of not more than 80 percent of the area median income based on the guidelines published by the U.S. Department of Housing and Urban Development.

Applicants must provide documentation evidencing that they receive one of the following benefits:

- Temporary Assistance for Needy Families (TANF);
- Supplemental Nutrition Assistance Program (SNAP);
- Medicaid;
- Women, Infants, and Children (WIC);
- National School Lunch Program (NSLP);
- Nevada Telecom Lifeline Program;
- Low-income housing and multi-family housing that qualifies for the Federal Low-Income Housing Tax Credits (LIHTC), or any other form of subsidized housing;
- Nevada Department of Welfare and Social Services for bill assistance program;
- Nevada Department of Welfare and Social Services for weatherization program; or
- Other State of Nevada programs that qualify customers for public assistance.

Applicants can also provide documentation from any other state, county, or local governmental or nonprofit organization that can demonstrate the applicant has an income of not more than 80 percent of the area median income based on the guidelines published by the Department of Housing and Urban Development.

To be eligible for this category, applicants must complete the Low-Income Application Form as shown in Appendix B.

A. Application and Selection Process

To participate in ESAP, customers must complete the application form, as provided as Appendix B, and submit the completed application form through the Companies' ESAP Portal or by regular mail. Postal address for mail submission can be found on the application form. Customers can also request to be mailed an application by contacting the Companies' Customer Service.

The application form will provide information for the low-income ESAP category, eligibility requirements, and the type of documentation that is required.

*a. Application Review*

As provided in Table 2 above, the 2027 application period will take place from September 1, 2026, through October 31, 2026. The Companies will review applications upon submission and will review applications through November 30, 2026. Applicants are responsible for ensuring that all required documentation is provided with the completed application form to avoid delays in determining eligibility.

The Companies anticipate contacting applicants through the preferred method of communication, as listed on the application form, within 10 business days of submission. Applicants will be notified of eligibility determination. Should applicants be notified of deficiencies with their submission, they will have 10 business days from date of notification to correct and resubmit. Deficient applications that are not corrected within the time provided will not be reviewed for eligibility and the applicant will be required to submit a new application form for review. If the applicant does not submit a complete application form during the application period, they will have to wait for the next application period to open.

Applicants may check the status of their application by contacting NV Energy Customer Service.

*b. Lottery Selection*

If, at the close of the enrollment window on October 31, 2026, the total number of eligible applicants exceeds available program capacity, the Companies will conduct a random lottery process. All eligible applicants will be entered into a database. Applicants will be selected at random using a list randomizer software, or comparable alternative, and the total number of applicants selected will be determined by the program capacity. Because ESAP will operate as a year-round program, the Companies may implement a capacity-based enrollment structure in which enrollment periods open or close based on available program capacity. Under this approach, eligible applicants may be placed on a waitlist when capacity is full, and a lottery may be used when the number of applicants exceeds available capacity or available waitlist positions. As capacity becomes available throughout the year, applicants may be selected from the waitlist on a rolling basis.

If the total number of eligible applicants is lower than the program capacity, a lottery will not take place and all eligible applicants will be enrolled in ESAP.

Beginning in 2027, the transition to rolling enrollment and the reallocation of all program capacity to the Low-Income customer category make the need for a formal lottery process unlikely; however, if application volumes exceed available capacity at any point, the Companies may still utilize a lottery to ensure equitable selection will eliminate the need for the formal lottery process.

*c. Waitlist and Interim Lottery Process*

Eligible applicants who were not selected in the lottery process will be placed on a waitlist that will only be valid for the Interim Lottery Process as described below. Eligible participants not selected in the Interim Lottery Process will be welcomed to apply for ESAP in accordance with the program's ongoing enrollment process.

Upon selection, applicants will be notified within 10 business days and enrollment will commence on the applicants' following billing cycle.

*d. Annual Recertification*

ESAP participants are required to submit proof of their continued eligibility to the ESAP category by completing the Recertification Section of the application form during the recertification period, which will occur 60 to 90 days prior to the anniversary of the customer's billing effective date. ESAP participants who fail to recertify will be removed from ESAP.

ESAP participants who are no longer eligible will be notified of their ineligibility through their preferred method of communication. Removal will be reflected in the participants' bill the cycle following the end date of that ESAP program year.

Beginning in 2027, recertification will occur on a rolling basis aligned with each participant's individual recertification date.

*e. Withdrawal of Participation*

Per the ESAP Regulations, participants may withdraw from ESAP at any time by contacting NV Energy Customer Service. Removal will be reflected in the participant's next bill cycle following the notification. For avoidance of doubt, ESAP termination will only take place in the instance of voluntary withdrawal or determination of ineligibility.

Beginning in 2027, available capacity resulting from participant withdrawal will be filled through the rolling enrollment process.

## III. Marketing Plan and Proposed Plan Budget

### A. Community Outreach

The Companies understand that ESAP requires outreach and education. To that end, the Companies are dedicated to ensuring awareness and knowledge of ESAP to customers.

Table 3 provides an overview of the marketing, outreach, and education plan for ESAP. Marketing and outreach efforts will be conducted to inform customers of ESAP policies, procedures and changes.

Efforts will target the general public, business groups, and community groups. The Companies will also work with community partners to collaborate on outreach efforts.

**Table 3: Marketing of ESAP Overview**

| Activity | Description |
|---|---|
| Customer Outreach | • Promote in 'My NV Energy Snapshot'.<br>• Insert advertisement on monthly bills.<br>• Host customer webinars, via Zoom or comparable system.<br>• Communicate with nonprofit and foundation giving programs.<br>• Share ESAP information with elected and government officials to be relayed to constituents. |
| Media Relations | • Press releases announcing initial ESAP milestone and schedule, workforce development activities, and community based solar resources schedule.<br>• Host media events to celebrate groundbreaking and completion of community based solar resources.<br>• Conduct targeted outreach through digital and traditional media channels. |
| Website | • Provide link to the ESAP website and application and enrollment information.<br>• Up to date information will be on ESAP website. |
| Social Media | • Post updates highlighting ESAP milestones.<br>• Post workforce development activities/achievements.<br>• Provide links to ESAP portal. |
| Grassroots Outreach | • Participate in community events to promote ESAP.<br>• Provide ESAP information to community partners to distribute at events.<br>• Develop plan with community partners to conduct outreach to drive awareness and enrollment. |

The Companies look forward to working with community partners on spreading information on ESAP to Nevadans.

B. Proposed Annual Budget

The ESAP Regulations require that the Companies submit a proposed annual budget for ESAP. Table 4 below provides the proposed budget for ESAP. The proposed ESAP budget aligns with AB 458 by supporting a Low-Income-focused program and a year-round rolling enrollment structure, which requires ongoing outreach, customer support, and application processing. The budget levels reflect expected participation and ensure efficient program delivery through targeted investments in key operational areas. Overall, the proposed budget supports increased customer access and is in the best interest of the public.

ESAP year spending will be allocated between Nevada Power and Sierra based on the program capacity per AB 465. Costs will be allocated 60 percent to Nevada Power and 40 percent to Sierra. A budget breakdown is included as Appendix C.

**Table 4: ESAP Proposed Annual Budget**

| Category | Budget |
|---|---|
| Program Administration | $240,000 |
| Program Marketing & Outreach | $320,000 |
| Program Education & Training | $32,000 |
| Call Center Costs | $230,000 |
| Web Portal and Application Tools | $25,000 |
| Application Processing | $210,000 |
| Total | $1,057,000 |

## IV. Expanded Solar Energy Rate

Customers who meet the eligibility criteria as described in this Plan and are selected to participate in ESAP pay the ESER for participating in the program. This energy-based rate replaces their otherwise applicable Base Tariff Energy Rates ("BTER") and Deferred Energy Accounting Adjustment ("DEAA"). In accordance with Section 15.5 of the Regulations, the revenues paid by participating customers will be applied to the deferred energy accounting balance in the same manner as the BTER and the DEAA rates.

Following review of prior Commission orders and established practice, the Companies propose to continue previously authorized methodology.[2] The Companies will exclude the costs associated with CBSRs from calculation of the 30 percent component of the ESER. However, such alternatives present significant practical and ratemaking challenges, including inconsistency with existing cost-recovery mechanisms and an increased risk of duplicative cost recovery. Additionally, CBSR-related expenditures are already recovered through the ESAP regulatory asset, and the Companies seek to avoid any duplication of recovery. The Companies will continue to monitor regulatory developments related to ESAP and will evaluate potential modifications to

[2] Order, August 30, 2022, Docket No. 22-03004 at paragraph 59. While this docket related to the approval of the cost recovery for the 2021 ESAP Program Plan, the Commission also considered the 30 percent weighted average and determined that Section 15(1) of the ESAP Regulations can be interpreted as requiring a rate for CBSRs only be included in the 30 percent weighted average if there are actual fuel or energy costs associated with any CBSRs.

rate design as appropriate in future filings. Based on the foregoing, the ESER in this 2027-2029 Implementation Plan is comprised of two key components:

1. 30 percent of the weighted average of the rates for selected utility-scale resources consistent with Section 15.1 of the Regulations or as otherwise authorized pursuant to an approved deviation. These resources collectively comprise the "Utility Resource" category shown in Tables 5 and 6. Further detail of how the Utility Resource portion of the ESER is calculated is provided below.
2. 70 percent of the combined quarterly BTER and DEAA rates requested by the Companies in the quarterly Deferred Energy filings.

Projected ESER rates over the Triennial Plan period, based on the calculations described above, are shown below in Table 5 for Nevada Power and Table 6 for Sierra.

**Table 5: Projected ESER Rate – Nevada Power**

| Projected NPC ESAP Program Participants Energy Rate (ESER) | 2027 | 2028 | 2029 |
|---|---|---|---|
| | | January | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.02721 | 0.03149 | 0.03129 |
| Calculated ESER | $ 0.03508 | $ 0.03936 | $ 0.03916 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.02887** | **$ 0.03498** | **$ 0.03470** |
| | | April | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.02486 | 0.03374 | 0.03196 |
| Calculated ESER | $ 0.03273 | $ 0.04161 | $ 0.03983 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.02551** | **$ 0.03820** | **$ 0.03566** |
| | | July | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.02531 | 0.03541 | 0.03240 |
| Calculated ESER | $ 0.03318 | $ 0.04328 | $ 0.04027 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.02616** | **$ 0.04059** | **$ 0.03628** |
| | | October | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.02743 | 0.03387 | 0.03366 |
| Calculated ESER | $ 0.03530 | $ 0.04174 | $ 0.04153 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.02919** | **$ 0.03839** | **$ 0.03808** |

**Table 6: Projected ESER Rate – Sierra**

| Projected SPPC ESAP Program Participants Energy Rate (ESER) | 2027 | 2028 | 2029 |
|---|---|---|---|
| | | January | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.02759 | 0.03726 | 0.03949 |
| Calculated ESER | $ 0.03546 | $ 0.04513 | $ 0.04736 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.02941** | **$ 0.04323** | **$ 0.04642** |
| | | April | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.02628 | 0.04181 | 0.04017 |
| Calculated ESER | $ 0.03415 | $ 0.04968 | $ 0.04804 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.02754** | **$ 0.04968** | **$ 0.04739** |
| | | July | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.03356 | 0.04426 | 0.04220 |
| Calculated ESER | $ 0.04143 | $ 0.05213 | $ 0.05007 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.03794** | **$ 0.05213** | **$ 0.05007** |
| | | October | |
| Utility Resource | $ 0.00787 | $ 0.00787 | $ 0.00787 |
| 70% BTER/DEAA | 0.03376 | 0.04328 | 0.04064 |
| Calculated ESER | $ 0.04163 | $ 0.05115 | $ 0.04851 |
| **ESER Rate with 1 cent minimum discount** | **$ 0.03823** | **$ 0.05115** | **$ 0.04805** |

A. Utility Resource Rate Component

The utility-scale component of the Solar Resource Rate implemented by the Companies is based solely on the weighted average energy price of the six projects approved in the Companies' Joint Triennial Integrated Resource Plan, Docket No. 18-06003.

The weighted average for the utility-scale offering is $25.61 per MWh for both Nevada Power and Sierra as shown below in Table 7.

**Table 7: Weighted Average for Utility-Scale Pricing in 2027**

| Utility-Scale Resource - Average 6 Power Purchase Agreements (PPA) Weighted by 2026 PPA Capacity | | | |
|---|---|---|---|
| **Renwable Resource Rate** | **Contract Capacity (MW)** | **PPA Rate [$/MWh]** | **Weighted Value** |
| Dodge Flat | 200 | $26.51 | 5,302 |
| Battle Mountain | 101 | $26.50 | 2,677 |
| Fish springs Ranch | 100 | $29.96 | 2,996 |
| Eagle Shadow Mountain | 300 | $23.76 | 7,128 |
| Copper Mountain 5 (LCOE w/o NU)[1] | 250 | $24.03 | 6,008 |
| Techren V | 50 | $29.89 | 1,495 |
| Total | 1,001 | | 25,606 |
| **Weighted Average RRR** | | | **$0.02558** |

B. Adjustment for Low-Income Participants

NRS 704.7865(2)(f)(3) requires the Commission to adjust qualifying low-income participant's ESAP rate downward as needed to guarantee a lower-energy rate. In Docket No. 20-12003, the Commission determined that the minimum discount for low-income participants should be $0.01000 per kWh below the otherwise applicable combined BTER and DEAA rates, but did not limit the discount should a lower overall ESER warrant a larger difference.[3]

To determine whether the ESER calculation is meeting the guaranteed $0.01000 per kWh discount as required for the low-income participants, the Companies compare the ESER to the combined BTER and DEAA rates calculated for that quarter. If the ESER is not at least $0.01000 per kWh less than the combined BTER and DEAA rates calculated for that quarter, then the low-income ESER is adjusted to achieve that $0.01000 per kWh discount for that quarter. If the ESER is more than $0.01000 per kWh less than the combined BTER and DEAA rates calculated for that quarter, then the low-income ESER is the same as the calculated ESER.

Tables 8 and 9 below demonstrate the projected difference between the ESER and the combined BTER and DEAA rates over the triennial Plan period for Nevada Power and Sierra, respectively. Any quarters where the discount does not exceed the required $0.01000 per kWh will be adjusted accordingly.

[3] Docket No. 20-12003, Aug. 11, 2021, Order at para. 271.

**Table 8: Projected Nevada Power Difference – ESER vs BTER/DEAA**

| Projected NPC Difference - ESER vs BTER/DEAA | | | |
|---|---|---|---|
| | 2027 | 2028 | 2029 |
| | January | | |
| ESER | $ 0.02887 | $ 0.03498 | $ 0.03470 |
| BTER/DEAA | 0.03887 | 0.04498 | 0.04470 |
| Difference | $ (0.01000) | $ (0.01000) | $ (0.01000) |
| | April | | |
| ESER | $ 0.02551 | $ 0.03820 | $ 0.03566 |
| BTER/DEAA | 0.03551 | 0.04820 | 0.04566 |
| Difference | $ (0.01000) | $ (0.01000) | $ (0.01000) |
| | July | | |
| ESER | $ 0.02616 | $ 0.04059 | $ 0.03628 |
| BTER/DEAA | 0.03616 | 0.05059 | 0.04628 |
| Difference | $ (0.01000) | $ (0.01000) | $ (0.01000) |
| | October | | |
| ESER | $ 0.02919 | $ 0.03839 | $ 0.03808 |
| BTER/DEAA | 0.03919 | 0.04839 | 0.04808 |
| Difference | $ (0.01000) | $ (0.01000) | $ (0.01000) |

**Table 9: Projected Sierra Difference – ESER vs BTER/DEAA**

| Projected SPPC Difference - ESER vs BTER/DEAA | | | |
|---|---|---|---|
| | 2027 | 2028 | 2029 |
| | | January | |
| ESER | $ 0.03546 | $ 0.04513 | $ 0.04736 |
| BTER/DEAA | 0.03941 | 0.05323 | 0.05642 |
| Difference | $ (0.00395) | $ (0.00810) | $ (0.00906) |
| | | April | |
| ESER | $ 0.03415 | $ 0.04968 | $ 0.04804 |
| BTER/DEAA | 0.03754 | 0.05973 | 0.05739 |
| Difference | $ (0.00339) | $ (0.01005) | $ (0.00935) |
| | | July | |
| ESER | $ 0.04143 | $ 0.05213 | $ 0.05007 |
| BTER/DEAA | 0.04794 | 0.06323 | 0.06029 |
| Difference | $ (0.00651) | $ (0.01110) | $ (0.01022) |
| | | October | |
| ESER | $ 0.04163 | $ 0.05115 | $ 0.04851 |
| BTER/DEAA | 0.04823 | 0.06183 | 0.05805 |
| Difference | $ (0.00660) | $ (0.01068) | $ (0.00954) |

C. Payment of Other Applicable Charges

Participating customers continue to pay all other applicable charges including but not limited to: the Base Tariff General Rate ("BTGR"), public policy rates such as Energy Efficiency and Renewable Energy Program Rates ("REPR"), the Universal Energy Charge ("UEC"), Natural Disaster Protection Plan ("NDPP") and franchise fees.

D. Rate Discount Tracking and Recovery

As described in the ESAP Regulations, the Companies track the ESAP rate discount, including any low-income customer discount, separately in a regulatory asset and recover it on a quarterly basis through the ESDR rate, which is recovered from all customers.

This tracking and recovery are made in conjunction with the quarterly BTER and DEAA filings pursuant to NRS § 704.110(10) and (11).

To calculate the ESAP discount, the non-participants' calculated BTER and DEAA rates are added together and then subtracted from the ESER for the applicable customer class. The rate difference is multiplied by the kWh usage for the ESAP participating customers. The total is the discount that is captured and recovered in the ESDR rate.

Due to the timing of the quarterly filings and Commission approval for the low-income discount, the ESAP revenue reduction is recorded for recovery in the following quarterly filing and incorporated for the preceding quarterly BTER and DEAA calculation to all non-participating customers.

B. Application of Revenues to Deferred Energy Balancing Account

The revenues received from ESAP participants' ESER is recorded in the Companies' applicable deferred energy balancing account, similar to BTER, DEAA, and Temporary Renewable Energy Development revenues.

## V. ESAP Public Policy Rate

A. Revenue Requirement Implementation Costs

*i. Regulatory Asset*

AB 465 requires the costs of implementing the Plan be recorded in a regulatory asset account maintained in a manner that will allow the costs to be readily identified.[4] The Companies proposed to the Commission, which was approved in Docket No. 19-06028, to establish a regulatory asset account for tracking applicable costs incurred for the Plan's execution.

The Companies have established a regulatory asset account for tracking all applicable costs incurred for the Plan's implementation, maintenance, and execution as distribution related costs in order to comply with the draft regulation Section 16 paragraph 4. Costs consist of incremental operation and maintenance-type costs attributable to ESAP which are recorded to the regulatory asset as incurred.

ii. Capital and Implementation Costs

As a part of the annual filing, the Companies calculate a revenue requirement consisting of the following.

- The revenue requirement for the solar facility includes a recovery of and return on the facility. The revenue requirement is updated annually as the facility depreciates over its service life.
- Regulatory asset costs, including carry for incremental costs of administering and maintaining the program.

The costs will be tracked on a calendar year basis for the twelve months ending December 31st, and then filed in the annual DEAA filing for rates to be effective October 1st of the preceding year.

[4] Prudent and reasonably incurred expenditures will be submitted to the Commission for approval as outlined in Section VII.

B. Annual Submission of Revenue Requirement

The ESAP regulations require the expenditures incurred by an electric utility Plan be recorded as a separate monthly rate charged to all retail customers of the electric utility. To follow the legislation, the Commission approved in Docket No. 19-06028 for the Companies to establish a regulatory asset account for tracking applicable costs incurred for the Plan's execution.

Recovery of the regulatory asset is included in the calculated revenue requirement filed on an annual basis per the Regulations. All costs incurred will be reviewed by the project manager and documented for justification.

The regulations established an annual cost recovery process for all prudent and reasonable expenditures made by the electric utility to develop and implement the Plan. The Companies file an application to recover the ESAP revenue requirement costs, for the preceding year, on or before March 1st in their annual DEAA filings.

C. Expanded Solar Program Costs ("ESPC") Recovery Rate

The revenue requirement captures all costs to be paid by all customer classes as specified in Section 16.4 and is a separate public policy rate filed in the annual DEAA filings. The revenue requirement is divided by the previous calendar year billing determinants, or kWh sales.

## VI. Portfolio Energy Credits

Any portfolio energy credits derived from ESAP will be used for renewable portfolio standard compliance by the Companies, per the ESAP Regulations.

## VII. Community-Based Solar Resources

A. Proposed Schedule for CBSR Process for Potential Future CBSRs

The Companies propose the following schedule, as shown in Table 9, for the nomination, selection, and construction of CBSRs. As stated above, no additional CBSRs are proposed in this Plan. Any future CBSRs will be requested in a subsequent ESAP amendment application. If any subsequent applications are submitted, the following information establishes the criteria and process used to select site locations for CBSRs.

**Table 10: CBSR Schedule**

| Action | Period |
|---|---|
| CBSR Nomination Period | Date to be determined |
| Nomination Period Ends | 4 months after Nomination Period |
| Scoring Period | 4 months after Nomination Period |
| Short List Published | 4 months after Nomination Period |
| Voting Period | Period is 1 month commencing 4 months after Nomination Period |
| Selected Sites Published | 5 months after Nomination Period |
| Host Site Contract Negotiations | Period is 3 months commencing 5 months after Nomination Period |
| ESAP Plan Amendment Submission | Date after negotiations are complete |
| Commission Approval | Date 180 days after amendment submission |
| Issue EPC Request for Proposal ("RFP") | Upon Commission approval |
| EPC RFP Event Closes | 30 days after RFP issued |
| Review Bids and Select Winner | After RFP closes |
| Vote on Site Name | 30 days after RFP closed[5] |
| Negotiate EPC Contract | Quarter after RFP selected |
| Construction Complete | Quarter after EPC Contract executed |

The schedule allows ESAP to be initiated using the utility scale solar resources as the tariff basis and for subscribers to be enrolled in ESAP. The regulations require the CBSR schedule to consider the amount of energy that is subscribed, the amount of energy that is expected to be subscribed, and the reserve amount that comports with the requirements of NRS § 704.7865(2)(h).

B. CBSR Nomination and Selection Overview

Community participation is integral in the selection of locations of the CBSRs. As outlined in this Plan, preferred host sites will be identified through a nomination process. The nomination process will include an initial request for nomination where Sponsors, through the CBSR web portal, will nominate sites for consideration using the nomination form included in Appendix D. This nomination form includes the criteria, and the associated weighting necessary to fully evaluate each of the proposed host sites and allows the Sponsor to tally their own initial score. Sponsors

[5] The Companies will utilize the same format for naming of the Mojave CBSR and will announce the timeline for the process pursuant to the marketing plan in Section 3 above.

will also provide an advocacy statement that includes the brief summary description of their CBSR design and host site, the benefits the host site provides to the community, and any other information the Sponsor would like to share about their site.

Once the nomination period ends, each initial score will be reviewed for accuracy by the Companies and updated as necessary with a description of why the score was changed.

Each proposed host site will then be ranked. Once ranked, the ranked list of nominated sites with scoring will be published on the CBSR website. After the public voting period ends, the final sites for CBSR will be selected based on those sites that receive the most public votes. Two alternative sites will also be chosen in the event where the selected sites cannot move forward.

This process provides complete transparency on what factors need to be considered in a CBSR, how each site compares to the other sites nominated and direction for the public to select the final site locations that will have the most benefit to the community.

Efforts will be made by the Companies to ensure that only their customers participate in the voting process and that voting is limited to one vote per person for the nominated sites.

If the Companies do not receive sufficient nominations for CBSRs in either service territory, the Companies will nominate sites that meet the criteria.

C. Site Selection and Scoring Criteria

The Companies will select CBSR sites based on those nominations that receive the highest weighted total from the following eight scoring categories:

- Site Location
- System Type
- Site Size
- Site Control
- Site Characteristics
- Grid Benefits/Interconnection
- Other Community Benefits and Services
- Statement of Support

Below, the Companies provide further information for each scoring category.

*a. Scoring Category 1: Site Location (25 percent of score)*

Per the ESAP Regulations, greater weight, in this case 25 percent, will be given to those host sites that are in disadvantaged or low-income communities. As defined in this Plan, disadvantaged communities are considered those areas that are above average in their minority population and have higher populations with less than a high school education. See Appendix E for additional information on how communities with higher levels of low-income will be determined and evaluated.

Each site will be evaluated based on these Demographic Indicators, along with low-income, using the EJSCREEN tool. By entering in the site address in the tool, the nominator will be able to specify a 1-mile buffer around the host site and "explore reports." The user will select those three Demographic Indicators being evaluated and create a Data Table similar to the figure below to be provided as part of their nomination.

Tabular View

1 miles Ring Centered at 36.256010,-115.137090, NEVADA, EPA Region 9 (Population: 22,259)

| # | Category | Selected Variables | Value | State Avg. | %ile in State | EPA Region Avg. | %ile in EPA Region | USA Avg. | %ile in USA |
|---|---|---|---|---|---|---|---|---|---|
| 24 | Demographic | Minority Population | 75% | 50% | 83 | 59% | 83 | 39% | 91 |
| 25 | Demographic | Low Income Population | 41% | 35% | 66 | 34% | 65 | 33% | 67 |
| 27 | Demographic | Population with Less Than High School Education | 15% | 14% | 64 | 17% | 56 | 13% | 67 |

As shown, the user can easily see that the selected community around the host site value (75 percent for minority population in the above table) is greater than the average state level (50 percent in the above table). The host site that is located within a one-mile radius community where the percentage of the minority population, the low-income population and the population with less than a high school education are all greater than the state average will receive a full points in the Site Location category.

If a site can demonstrate two out of the three variables are true, the score will be reduced to four and if only one variable is true, the score is three. For those sites that are not located in a low-income or disadvantaged community, they will receive zero points but will not be disqualified from further review.

### *b. Scoring Category 2: System Type (10 percent of score)*

The proposed system type not only defines ease of access and visibility of a CBSR, but more importantly, is a deciding factor in the price. In the scoring matrix, the System Type is 10 percent of the overall score.

There are three basic system types that can be proposed for a CBSR; rooftop, ground mount or a car port system.

A **roof mount** system is when the solar racking, which holds the panels in place, is installed directly on the roof. Panels can be attached to flat or sloping roofs consisting of metal, shingle, or rubber materials. Roof mount systems are the least expensive system to install and utilize space that otherwise would not be used.

However, the cost of these systems can increase due to a fixed orientation because of rooftop design, age and condition of the roof; roof warranty terms and conditions should be considered. When a new roof is required before installation of a new rooftop solar system can be done, the costs will increase significantly.

A **ground mount** system is when the panels are secured to a rack structure that is connected to the ground with steel beams or another type of metal post. Ground mounts can be installed in an open area in any direction, positioning them for optimal energy production.

These systems can also be easily accessed for maintenance and training purposes. Ground mount systems typically have a higher installation cost and are limited by available land.

A **car port** system is a type of ground mount system that is built to cover parking areas. These systems cost more than both the rooftop solar system and the ground mount system however, they do not take up large areas of land. Typically, an existing car port cannot support the additional weight of a solar system.

*c. Scoring Category 3: Site Size (10 percent of score)*

The area available, weighted at 10 percent of the overall score, for solar development at each of the site locations will be the biggest determinant of the system size or capacity in kilowatts. As a frame of reference, a 1 kW system will require approximately 100 square feet of area. That would mean the maximum expected site allowed under ESAP (maximum capacity is 1 MW) would be 100,000 square feet or less than 2.5 acres.

In general, the larger the system, the more efficient costs of installation are, and each system size is scored accordingly. Sponsors are required to also provide the actual expected area for solar installation in their nomination form.

*d. Scoring Category 4: Site Control (five percent of score)*

For 5 percent of the overall score, the Sponsor must state whether the host site is under direct ownership or leased. The Companies will directly contract with the property owner on a lease agreement, purchase agreement or easement on the property should it be selected as the host site.

However, there are circumstances (i.e. property under a Bureau of Land Management lease) that may be accommodated for if the appropriate permits and authorizations are in place.

A proposed site that has a complex site control situation may result in fewer points allotted to the project. The Sponsor will provide a description of the property ownership and/or lease agreement in the nomination form.

*e. Scoring Category 5: Site Characteristics (15 percent of score)*

Consisting of 15 percent of the overall score, site characteristics provide insight into the detailed engineering and energy output of a system. Photographs will help the public understand where the system will be installed and what is surrounding that system.

- Shading: For any solar installation, shading can reduce the energy output. The location with no shading will receive the maximum available points of five. But as more potential shading is identified, the fewer the points. Each nomination will include a description and picture of any potential shading identified on the project site.

- Module Orientation: Whatever the system type, the orientation and tilt of the solar panels will play a role in energy produced. The optimal angle for solar panels in Nevada is south

facing at approximately 36 degrees. In the nomination form, sites that are south facing will receive the most points possible and those sites that only allow north facing panel orientation will receive zero points. For rooftop solar systems, the Sponsor is asked to provide the angle of the rooftop as this will dictate the tilt of the panels. The tilt can typically be specified by the engineer for ground mount and car port systems.

- Obstructions: Particularly for rooftop CBSR systems, obstructions, such as HVAC systems or venting systems, can reduce the overall capacity potential of the CBSR. In the nominations form, the Sponsor will identify any other obstructions that could cause the CBSR to be constructed in other than a straightforward manner.

- Site Access: Site access for construction crews and operations and maintenance crews are components of a host site viability. Additionally, one of the primary goals of ESAP, particularly with CBSR, is to provide teaching, training and job opportunities for the immediate and surrounding communities they are located in during construction and operations. Ease of access to not only the host site location but also to the solar equipment will provide the greatest opportunity for teaching and training on solar installations and the greatest benefit to the community.

- Site Security: Site security will be evaluated to determine if there is a balance of visual access and access for training and education while providing sufficient security to minimize accidental and deliberate physical damage to the site and equipment. Nominations will be evaluated on whether the site will provide secured and authorized only access through fencing or some other physical means.

- Capable of Obtaining Permits: Each site nominated will have a similar set of basic permits that will be required to construct a new solar installation such as electrical permits. However, some sites will require unique permits. For instance, sites where a carport is being proposed will require structural permits, some sites may require a zoning change or other sites may be on school property and the authority having jurisdiction such as Nevada System of Higher Education will be required to provide authorization. Sites that are part of a master parcel may need to be split or a master Homeowners Association may need to sign off on the solar installation. The Sponsor for each site will need to understand the proposed project land zoning status and may need to reach out to a local contractor to see if there are any significant permitting hurdles for their site.

*f. Scoring Category 6: Grid Benefits/Interconnection (25 percent of score)*

For 25 percent of the overall scoring, proposed sites will be evaluated based on their ability to enhance electric grid resiliency and provide measurable benefits to the surrounding community. In addition to traditional interconnection considerations, priority will be given to projects that strengthen grid performance during normal operations and outage conditions while delivering localized community value. NV Energy's Distributed Resource Plan ("DRP") web portal (https://drp.nvenergy.com/drp-external) can easily be used by the public to understand the interconnection and grid benefits of their project. The DRP web portal provides a Hosting Capacity Analysis, maps and accessible downloadable electronic data for distribution to the public.

The information on NV Energy's web portal can assist developers and vendors seeking information to support quality decisions in siting Distributed Energy Resources ("DER"). The Web Portal provides Hosting Capacity Analysis, Grid Needs Assessment and Locational Net Benefit Analysis information for the Companies' electric distribution system, allowing users to quickly find areas that have constraints, greater ability or incorporate new DER capacity, or enhanced benefits of locating DERs in a given area.

*g. Scoring Category 7: Other Community Services or Benefits (5 percent of score)*

Recognizing that there may be other criteria not considered that could provide community services or benefits, Sponsors can provide a summary of any other information that should be considered in scoring each site and receive 5 percent of their overall score. Sponsors are asked to provide a summary of any other criteria they would like to be considered in scoring their project.

*h. Scoring Category 8: Statement of Support (5 percent of score)*

To facilitate success in contracting and construction of each nominated project, each Sponsor will be asked to provide a statement of support for their project substantially similar to the template in Appendix F. The pro forma Statement of Support will include a statement from the land owner that they possess the necessary land rights for sufficient site control to develop the project as proposed, they have read the request for nominations and understands their obligations, they have reviewed the agreement term sheets and are willing to enter in to good faith negotiations with the Companies. The landowner would attest that the site would be available for the full duration of a CBSR, typically 20 years and that they intend to remain in that location for the expected future.

D. Scoring and Selection of CBSR Sites

Each nomination will be initially evaluated by the Companies to determine the proposal's conformance to the directives of the nomination protocol. Within 10 business days of receipt, proposals not conforming will be given a letter of non-conformance and provided an opportunity to submit missing or incomplete information within an additional 10 business days from notification.

The Companies will then conduct an evaluation of the nominated sites. Documentation and responses to questions provided for each nomination will be reviewed and the points based on how that information satisfies the requirements of the components of each category in the nomination form will be verified. Any changes or updates made to the points will be documented.

The scoring structure provides insight into the viability and value of a project, relative to all other projects nominated. The eight categories of criteria identified in the nomination form are used to quantify a project's strengths and weaknesses in key areas of project development and how well the proposal meets the regulatory requirements. A project's score is indicative of a project's likelihood to achieve the greatest community benefit.
Cost consideration is done using non-financial inputs provided with each nomination. Specifically, system type, site size, site characteristics and grid benefits all contribute towards the overall levelized cost of energy or the cost of each megawatt hour of energy delivered over the life of the

project. This method of cost consideration allows for greater weighting in scoring sites based on non-price benefits such as those sites located in disadvantaged or low-income communities. Additionally, this method allows the process to move forward without requiring a solar vendor price quote at each of the nominated sites.

The Companies will rank sites based on a nomination's highest overall score derived from the evaluation of non-price factors. This ranking will be indicative of the locations that provide the best value to ESAP.

Although unlikely, no two sites selected may be contiguous geographic locations. In the event two contiguous sites are selected by the community, the site with the lower number of votes will be eliminated and one of the alternative sites will be selected.

E. CBSR RFP and Construction

Once sites are secured, an RFP will be issued for engineering procure and construction ("EPC services. The RFP will require bidders accept workforce innovations and opportunity by including at least one employee per every five that has successfully completed the DETR workforce training program and certification that at least 50 percent of the employees engaged in construction of the project are residence of Nevada.

The RFP will require bidders enter into a work site agreement that states they are using workers who have participated in the training for this program and that they are working at the community solar site identified.

This process assumes all system types nominated would have similar EPC costs although a 1-MW site would cost less on a cost per kilowatt than a 10-kW site. There is an economy of scale when building larger solar resources.

F. CBSR Site Naming Process

The community will be actively involved in the naming of the CBSR through a process similar to the nomination process. Through the CBSR web portal, a summary of the selected sites, likely the advocacy paragraph submitted by the Sponsors, along with site photographs will be posted. Customers will be able to suggest and vote on names for the selected sites.

G. CBSR Site Host Compensation

Once the sites are selected, the Companies will negotiate terms and conditions with each site owner. Negotiations with alternate sites will only be initiated in the event the land use contract terms and conditions could not be negotiated with the initial landowners. Site owners would be compensated on a cost per MW basis. An example term sheet is included in Appendix G.

## Appendix A

Definitions

1.1. "Brownfield site" has the meaning ascribed to it in 42 U.S.C. § 9601.
1.2. "Community-based solar resource" has the meaning ascribed to it by NRS § 704.7865(6)(b).
1.3. "Disadvantaged business" has the meaning ascribed to it by NRS § 704.7865(6)(c).
1.4. "Electric utility" has the meaning ascribed to it in NRS § 704.187.
1.5. "Electric utility that primarily serves densely populated counties" has the meaning ascribed to it in NRS § 704.110.
1.6. "Electric utility that primarily serves less densely populated counties" has the meaning ascribed to it in NRS § 704.110.
1.7. "Eligible customer" has the meaning ascribed to it by NRS § 704.7865(6)(g).
1.8. "Eligible premises customer" means a customer who is a fully bundled residential customer of an electric utility who cannot install solar resources on the customer's premises due to physical or ownership constraints on the premises.
1.9. "Expanded solar access program plan" means the expanded solar access program plan submitted to the Commission by an electric utility pursuant to section 11 of the ESAP regulation.
1.10. "Expanded solar access program rate" means a fixed-rate charge approved by the Commission to be charged to customers participating in an expanded solar access program, which replaces the base tariff energy rate and the deferred energy accounting adjustment and which is adjusted in accordance with the quarterly calculations of the Commission.
1.11. "Fully bundled customer" has the meaning ascribed to it by NRS § 704.7865(6)(h).
1.12. "Fully bundled general service customer" has the meaning ascribed to it by NRS § 704.7865(6)(i).
1.13. "Fully bundled residential customer" has the meaning ascribed to it by NRS § 704.7865(6)(j).
1.14. "Low-income eligible customer" has the meaning ascribed to it by NRS § 704.7865(6)(k).
1.15. "Non-contiguous geographic locations" means two geographic locations that are not adjoining along a boundary or consisting of parts that adjoin.
1.16. "Nonprofit Organization" means an organization which qualifies as tax exempt pursuant to section 501(c) of the Internal Revenue Code, 26 U.S.C § 501(c).
1.17. "Solar Energy Zone" has the meaning ascribed to it by NRS § 704.7865(6)(l).
1.18. "Solar resource" has the meaning ascribed to it by NRS § 704.7865(6)(m).
1.19. "Solar workforce innovations and opportunity program" has the meaning ascribed to it by NRS § 704.7865(6)(n).
1.20. "Utility scale solar resource" has the meaning ascribed to it by NRS § 704.7865(6)(o).

NVEnergy

# Appendix B

Expanded Solar Access Program
Low Income Application Form

NVEnergy

EXPANDED SOLAR ACCESS PROGRAM NV ENERGY

**Submit completed applications via email or mail below:**

**Email:** ESAPsupport@nvenergy.com

**Mail:** NV Energy
P.O. Box 883
Aurora, OR 97002-7002

## Low-Income Application Form

◯ New Application ◯ Recertification

**PREFERRED METHOD OF CONTACT (Select one):** ◯ Mail ◯ Email

| | | | | | |
|---|---|---|---|---|---|
| Do you currently have a rooftop solar system? ◯ Yes ◯ No | | | **If you selected Yes, you are not eligible to participate in ESAP.** | | |
| ACCOUNT HOLDER/CO-APPLICANT FIRST NAME | | ACCOUNT HOLDER/CO-APPLICANT LAST NAME | | MIDDLE INITIAL | |
| CUSTOMER ADDRESS (PREMISE) | | | | | |
| CITY | STATE | ZIP CODE | EMAIL | | |
| 19-DIGIT NV ENERGY ACCOUNT # | | HOME PHONE | CELL PHONE | | |
| MAILING ADDRESS (IF DIFFERENT FROM PREMISE) | | CITY | STATE | ZIP CODE | |

**Low-income Eligible Customer:**
*(Household income of not more than 80 percent of the area median income and provide current documentation of one of the following)*:

- Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Women, Infants, and Children (WIC)
- National School Lunch Program (NSLP)
- Nevada Telecom Lifeline Program
- Low-income housing and multi-family housing that qualifies for the Federal Low-income
- Housing Tax Credits (LIHTC), or any other form of subsidized housing
- Nevada Department of Welfare and Social Services for bill assistance program
- Nevada Department of Welfare and Social Services for weatherization program
- Other State of Nevada programs that qualifies customers for public assistance
- Other documentation verifying yearly income is not more than 80% area median income (example: redacted tax return from prior year)

## Appendix C

Proposed Annual Budget Breakdown

Program Administration

- One Senior Project Manager: $120,000/year
- One Field Engineer: $100,000/year
- Administrative costs: $20,000/year

Program Marketing and Outreach (Based on EV Program Marketing and Outreach)

- Advertising: $27,000 (Flynn Wright, etc.)
- Customer Awareness Events: $200,000
- Customer Focus & Outreach Efforts: $85,000
- Pamphlets: $3,000
- Promotional items: $5,000

Program Education and Training (Based on EV Program Marketing and Outreach)

- Workforce Training Material: $25,000
- Training Sessions/Webinars: $7,000

Call Center Costs (Based on Clean Energy Programs call center services contract)

- Total Annual Estimated: $230,000
    - In-Bound Calls $25.50/hour
    - Estimated 750 hours/month: $19,125

Web Portal

- Web site and application portal design: $25,000

Application Processing (Based on PowerClerk application tool license)

- Base subscription fee (licenses): $48,000
- Base Application fee: $8.00 x 20,250 estimated applications per year: $162,000

# Appendix D

## Expanded Solar Access Program Host Site Nomination Form

NVEnergy

### Expanded Solar Access Program Host Site Nomination Form

**Sponsor Name:** _____

**Sponsor Contact Number:** _____

**Sponsor Email Address:** _____

**Host Site Location Address:** _____

_____

Provide up to three site name suggestions for your proposed site that may be used for voting if site is shortlisted:

1. _____
2. _____
3. _____

*Please note that any names that contain vulgarity, hate speech, offensive, inappropriate, derogatory language, or otherwise unbecoming language of any kind will not be accepted and excluded from consideration, at NV Energy's sole discretion.*

**1.0 SITE LOCATION.** Please provide the host site address and select where the host site falls within the EJSCREEN*

- ◯ Disadvantaged and Low-income community (3 variables greater than state average)
- ◯ Disadvantaged and Low-income area (2 variables greater than state average)
- ◯ Disadvantaged and Low-income area (1 variable greater than state average)
- ◯ None

**EJScreen is an environmental justice mapping and screening tool used by the Environmental Protection Agency* **https://ejscreen.epa.gov/mapper/**

**2.0 SOLAR SYSTEM TYPE.** Where will the solar system be mounted?

- ◯ Ground
- ◯ Rooftop
- ◯ Car Port

**3.0 SITE SIZE.** How much approximate area is available for solar system installation?

- ◯ 0 – 1,000 ft²
- ◯ 1,000 – 10,000 ft²
- ◯ 10,000 – 50,000 ft²
- ◯ 50,000 – 100,000 ft²

**Please complete the information requested on the Nomination Form and submit via email or mail below:**

**Email:** CBSR@nvenergy.com
**Mail:** NV Energy
7155 S. Lindell Rd.
Attn: ESAP M/S B13RE
Las Vegas, NV 89118

Please email or call 702-867-7200 or 775-399-7201, Monday-Friday, between 8:00 am to 5:00 pm PST for any questions.

**4.0 SITE CHARACTERISTICS.** Please provide a minimum of three photos of the host site from different angles.

**4.1 Shading.** What level of shading will the site have from adjacent structures during day time?

- ◯ None
- ◯ Some (less than a quarter of the site may be shaded)
- ◯ Significant (greater than a quarter of the site may be shaded)

**4.2 Site Orientation.** Which direction will the solar panels face upon installation at the site?

- ◯ South
- ◯ East
- ◯ West
- ◯ North
- ◯ For a rooftop site, please provide the rooftop angle, if possible.

_____

**4.3 Site Obstructions.** Will the site have any obstructions during construction and operation e.g., vents, HVAC, or other existing objects?

- ◯ None
- ◯ Some (small objects and/or number less than 10)
- ◯ Many (large objects and/or number greater than 10)

**4.4 Site Access.** What type of access will be allowed for operation and maintenance?

- ◯ Direct (access available after parking and single check-in through security)
- ◯ Indirect (access available after more than one check-in)
- ◯ Difficult (access available after more than one check-in and special equipment needed)

**4.5 Site Security.** What level of security be present at the site?

- ◯ Secured and Authorized Access (i.e Fenced Area)
- ◯ Set Back from major roadways, streets, etc.
- ◯ Open Access from major roadways, streets, etc.

## Appendix E

Communities with Higher Levels of Low-Income

NRS § 704.7865(2)(g) and the ESAP Regulations require that communities with higher levels of low-income be given weight in the selecting of the CBSR sites.

The Environmental Justice Screening and Mapping Tool called EJSCREEN[6] published by the United States Environmental Protection Agency is a mechanism for Sponsors to determine whether a site location for a CBSR is within a community with higher levels of low-income. EJSCREEN is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. EJSCREEN is an easy and readily available tool where the public can choose a geographic area and the tool then provides the demographic and environmental information for that area.

Sponsors for CBSR will use EJSCREEN to develop a report on the low-income and disadvantaged population indicators, specifically percent minority and percent having less than a high school education, within a one-mile radius of their site. The tool defines "low-income" as households where the household income is less than or equal to twice the federal "poverty level." The "percent minority" is defined as a group who list their racial status as a race other than white alone and/or list their ethnicity as Hispanic or Latino. "Less than high school education" is defined as the percent of people age 25 or older whose education is short of a high school diploma. When Sponsors are nominating sites, those sites that demonstrate they are in areas of low-income populations and disadvantaged communities (higher levels of minority populations and less than high school education) will be scored the highest as shown on the nomination form.

[6] https://ejscreen.epa.gov/mapper/

## Appendix F

Statement of Support

"[Insert legal name of Sponsor/Property Owner] (the "Sponsor/Property Owner") acknowledges receipt of NV Energy's [insert NV Energy's Request for Nomination ("RFN") date and title] on or about [insert date], 202_. Sponsor makes the following representations to NV Energy:

1. All of the statements and representations made in this proposal are true to the best of Sponsor's/Property Owner's knowledge and belief;

2. Sponsor/Property Owner, possesses a legally binding agreement(s) or option(s) to possess all necessary land rights for sufficient site control to undertake development of the project as set forth in the nomination, including ingress and egress to and from the site;

3. This proposal pertains to a renewable energy system, including environmental and renewable energy attributes, from a renewable energy system. The renewable energy system will meet the requirements of NRS § 704.7315, § 704.7811 and § 704.7815; and NAC § 704.8831 to 704.8893; and the generating facility is or will be qualified as a renewable energy system in accordance with NRS §704.7801 to 7828; and the associated draft regulations promulgated by the PUCN;

4. Sponsor/Property Owner has read the requirements, obligations and disclaimers of this RFN and understands Sponsor's obligations and NV Energy's rights;

5. Sponsor/Property Owner has reviewed the term sheet agreement(s), and Sponsor/Property Owner agrees to negotiate in good faith the terms and conditions for the easement, lease or purchase including compensation; and

6. This nomination is a firm and binding offer, for a period of at least 220 days from [insert date of letter/bid submittal]."

## Appendix G

Non-Binding Term Sheet for Exclusive Easement

*This following summary of proposed terms and conditions is for discussion purposes only, does not constitute an offer capable of acceptance, and does not address all of the material terms and conditions of the Proposed Transaction described below. Nothing herein shall obligate Grantor or Grantee, or any of their respective affiliates, or any other person to enter into the Proposed Transaction on the terms set forth below or otherwise. Except for the Binding Provisions of this Indicative Offer, which shall be binding upon execution of this Indicative Offer by the Parties, no binding obligation shall arise unless and until each of the Parties has completed all confirmatory financial, legal and other due diligence and a mutually acceptable agreement has been executed and delivered by Grantor or Grantee, and all other applicable parties.*

| | |
|---|---|
| **Grantee** | [Nevada Power Company or Sierra Pacific Power Company] d/b/a NV Energy |
| **Grantor** | |
| **Compensation** | |
| **Facility Site** | A development site located in [ ] County, Nevada ("Facility Site") that is capable of being fully permitted and developed to permit the construction and commissioning, by [date] of an approximately [ ] kW photovoltaic solar project ("Project") |
| **Term** | The easement would be effective for a period of [ ] years and shall terminate on [ ] |
| **Easement** | Easement to construct, operate, add to, modify, maintain and remove solar generation including above ground and/or underground communication facilities and electric line system(s) for the generation, distribution and transmission of electricity, such system(s) consist of photovoltaic panels, mounting structures, regulators, inverters, converters, optimizers, pads, switches, poles, wires, cables, conduit, duct banks, manholes, vaults, transformers, cameras, service boxes/meter panels, meters, cabinets, bollards, anchors, guys, and other equipment, fixtures, apparatus, and improvements ("Utility Facilities") upon, over, under and through the property. |
| **Construction** | For purposes of construction, Grantee would have a temporary easement upon, over, under and through the property legally described the Grant of Easement ("Temporary Easement Area"), such temporary easement would terminate on [date]. Grantee would restore the Temporary Easement Area to its prior condition upon completion of construction of the Utility Facilities; |
| **Ingress/Egress** | Grantee would be allowed ingress and egress to, from, over and across the Easement Area and the Temporary Easement Area for the allowed purposes defined above and for all other activities permitted by the agreement; |

| | |
|---|---|
| **Improvements** | Grantee would be able to remove, clear, cut or trim any obstruction or material (including trees, other vegetation and structures) from the surface or subsurface of the Easement Area as Grantee may deem necessary or advisable for the safe and proper use and maintenance of the Utility Facilities in the Easement Area |
| **Grantee Responsible** | Grantee would be responsible for any damages, proximately caused by Grantee negligently constructing, operating, adding to, maintaining, or removing the Utility Facilities, to any tangible, personal property or improvements owned by Grantor and located on the Easement Area on the date Grantor signs the Grant of Easement. |
| **Facility Ownership** | Grantee would retain ownership of all Utility Facilities at all times, which the parties agree are the personal property of Grantee and not fixtures to the real property of Grantor. Grantor would agree that it would forever refrain from claiming any ownership or right in and to title to the Utility Facilities. |
| **Grantor Restrictions** | Grantor would covenant for the benefit of Grantee, its successors and assigns, that it would make absolutely no use of the Easement Area, including but not limited to, constructing or placing any building, structure or other real property improvements within the Easement Area nor within the Temporary Easement Area (for the term of such temporary easement). Grantor would also covenant for the benefit of Grantee, its successors and assigns, that it would not construct or place any building, structure or other real property improvements within [ ] feet of the Utility Facilities. Grantee may, in its absolute discretion, install perimeter fencing or walls and gates and may further lock, secure and monitor the Easement Area and the Utility Facilities. Any desired access by Grantor or its invitees to access and enter the Easement Area would be approved and coordinated in advance by Grantee. |

# CERTIFICATE OF SERVICE

Nevada Power Company
and Sierra Pacific Power Company
d/b/a NV Energy

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing filing of **NEVADA POWER COMPANY D/B/A NV ENERGY and SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY** in Docket No. 26-06___ upon the persons listed below by electronic email:

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DATED this 30th day of June, 2026.

*/s/ Lynn D'Innocenti*
Lynn D'Innocenti
Paralegal
Nevada Power Company d/b/a NV Energy
Sierra Pacific Power Company d/b/a NV Energy