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26-05007

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## BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Joint Application of Nevada Power Company d/b/a )  
 NV Energy and Sierra Pacific Power Company )  
 d/b/a NV Energy for approval of their 2027-2047 ) Docket No. 26-05007  
 Triennial Integrated Resource Plan and 2027-2029 )  
Energy Supply Plan. )

**NEVADA POWER COMPANY D/B/A NV ENERGY AND SIERRA PACIFIC  
 POWER COMPANY D/B/A NV ENERGY'S MOTION TO STRIKE PORTIONS OF  
 THE DIRECT TESTIMONY OF RAO KONIDENA AND REQUEST FOR  
 EXPEDITED TREATMENT**

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") hereby submit this Emergency Motion to Strike (the "Motion") pursuant to Nevada Administrative Code ("NAC") 703.712 to strike portions of the Prepared Direct Testimony of Rao Konidena on behalf of Vote Solar filed on October 16, 2026. The Companies respectfully request the Public Utilities Commission of Nevada ("Commission") strike the following portions of the Mr. Konidena's testimony, which the Companies identify with highlighting in Exhibit A to this Motion:

- Q&A 9, subpoints 1 and 2;
- Q&A 11;
- Q&A 12, sentence beginning "The GSR-E and GSR0C are a directionally correct . . ." and ending "alternative to utility-scale generation capacity;"
- Q&A 12, third bullet point;
- Q&A 14;
- Q&A 16;
- Q&A 17;
- Q&A 18;
- Q&A 21, first and second full sentences.

## **BACKGROUND**

On May 6, 2026, the Companies filed their joint triennial integrated resource plan (the “2026 Joint IRP”). The 2026 Joint IRP included, pursuant to NAC 704.9156, the Companies’ proposed Demand Side Management Plan (the “DSM Plan”). On June 18, 2026, the Commission issued Procedural Order No. 1, which, among other things, established that the DSM Plan would be addressed in Phase II of this proceeding. The Commission, in Procedural Order No. 1, ordered that “Intervenors shall file with the Commission and serve on all parties of record PREPARED DIRECT TESTIMONY” regarding Phase II, including the DSM Plan, “on or before TUESDAY, SEPTEMBER 22, 2026, by 12:00 p.m.”<sup>1</sup> Accordingly, interveners in this docket filed testimony of 37 separate witnesses on September 22, 2026, of which 14 addressed the Companies DSM Plan, Distributed Resources Plan, or Transportation Electrification Plan. Vote Solar submitted prepared direct testimony of Claudine Custodio on September 22, 2026.

Procedural Order No. 1 also established that interveners prepared direct testimony related to Phase III of this proceeding, regarding the Companies’ load forecast, proposed supply-side resources, financial plan, etc., were to be filed on Friday, October 16, 2026.<sup>2</sup> On October 16, 2026, Vote Solar submitted the Prepared Direct Testimony of Rao Konidena (the “Vote Solar Phase III Testimony”).

The Companies hereby move to strike certain portions of the Vote Solar Phase III Testimony that directly address issues before the Commission in Phase II of this proceeding and that Vote Solar should have filed on September 22, 2026.

## **ARGUMENT**

NAC 703.710 states that prepared testimony must be submitted according to the deadline specified by the Commission. Here, the Commission’s Procedural Order No. 1 is clear that intervenor testimony related to the Companies’ proposed DSM Plan was to be

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<sup>1</sup> Procedural Order No. 1 at paragraph 14(b)(i).

<sup>2</sup> *Id.* at paragraph 14(c)(i).

submitted by September 22, 2026. The Vote Solar Phase III Testimony seeks to avoid this deadline by stating simply that the portions of the DSM Plan it addresses are, in the witness's opinion, "not a good fit as part of a DSM program and more appropriate as part of a Supply Side Plan."<sup>3</sup> An intervenor's opinion as to the proper placement of a specific portion of the Companies' DSM Plan does not, however, give that party freedom to address the issue in whatever Phase of the proceeding it sees fit. Specifically, various portions of the Vote Solar Phase III Testimony directly address the Companies' Grid Services Rider-Capacity ("GSR-C") and Grid Services Rider-Energy ("GSR-E") grid services compensation methodology proposed and extensively discussed in Section 9.A of the DSM Plan.

In Q&A 11 of the Vote Solar Phase III Testimony, Vote Solar attempts to justify its discussion of GSR-C in Phase III. Vote Solar provides several reasons why it believes that GSR-C should be discussed in Phase III but cannot overcome the plain fact that the Companies included GSR-C in their DSM Plan, which is exclusively addressed in Phase II. Vote Solar's disagreement with that placement does not change the Companies' filing nor the Commission's ordered schedule. Moreover, arguments regarding the proper placement of GSR-C should have been addressed in Phase II, not in whatever phase Vote Solar prefers. Inclusion of Q&A 11 in Vote Solar's Phase III testimony deprives the Companies of the ability to meaningfully rebut it and the Commission of the ability to decide the question. Q&A 11 should be stricken.

Q&A 12 of the Vote Solar Phase III Testimony directly critiques the sufficiency of the GSR-E and GSR-C compensation methodology. The parameters and compensation methodology proposed for GSR-E and GSR-C are included in the DSM Plan<sup>4</sup> and are properly addressed in Phase II of this proceeding. Other interveners understood this and properly provided their feedback on September 22, 2026.<sup>5</sup> Accordingly, the portions of Q&A 12 identified in Exhibit A should be stricken.

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<sup>3</sup> Prepared Direct Testimony of Rao Konidena at Q&A 11.

<sup>4</sup> See DSM Plan at Section 9.A.7-8.

<sup>5</sup> See Prepared Direct Testimony of Brian Turner, September 22, 2026, at Q&As 59-75; Prepared Direct Testimony of Kevin Lucas, September 22, 2026, at Q&A 25-39.

Q&As 14, 17 and 18 of the Vote Solar Phase III Testimony address the Companies' valuation of capacity for the purposes of compensation under GSR-C and include Vote Solar's alternative valuation proposal. Again, the compensation methodology and data sources for GSR-C are included in the DSM Plan<sup>6</sup> and, again, are addressed by other interveners properly in Phase II in their September 22, 2026, testimony.<sup>7</sup> Q&As 14, 17 and 18, and the portions of Q&As 9 and 21 that restate Vote Solar's position in these sections, should be stricken.

Q&A 16 of the Vote Solar Phase III Testimony includes Vote Solar's critique of the Companies' Capacity Resource Rate ("CRR"), a core mechanism of GSR-C. The CRR is defined and extensively explained in Section 9.A.8 of the DSM Plan. Again, other interveners addressed their concerns regarding the CRR in their September 22, 2026, testimony.<sup>8</sup> Q&A 16, and the portions of Q&As 9 and 21 that restate Vote Solar's position in these sections, should be stricken.

### **REQUEST FOR EXPEDITED TREATMENT**

With the Phase II hearing scheduled to begin on Monday, October 26, 2026, and the Companies' Phase III rebuttal testimony due on Monday, November 2, 2026, an expedited treatment of this Motion is required.<sup>9</sup> Accordingly, the Companies request that the Commission direct that any responses to this Motion be filed by noon, October 23, 2026, in accordance with the Commission's authority under NAC 703.555(2)(b).<sup>10</sup>

<sup>6</sup> See DSM Plan at Section 9.A.8.e.

<sup>7</sup> See Prepared Direct Testimony of Brian Turner, September 22, 2026, at Q&As 61-66; Prepared Direct Testimony of Kevin Lucas, September 22, 2026, at Q&As 25-28.

<sup>8</sup> See Prepared Direct Testimony of Emily Walsh, September 22, 2026, at Q&As 46-52; Prepared Direct Testimony of Michael Roberson, September 22, 2026, at Q&As 17-18; Prepared Direct Testimony of Brian Turner, September 22, 2026, at Q&As 67-75; Prepared Direct Testimony of Kevin Lucas, September 22, 2026, at Q&As 36-39.

<sup>9</sup> The Companies' witnesses preparing to testify in the Phase II hearing must know whether they must also prepare to file rebuttal testimony on November 2, 2026.

<sup>10</sup> Except as otherwise provided in subsection 6 or otherwise directed by the presiding officer, filed with the Commission no later than 5 business days after receipt of service of the motion.

**CONCLUSION**

The Companies' DSM Plan is part of Phase II of this proceeding, in which all written testimony has already been received and parties are now preparing for hearing. To the extent Vote Solar disagreed with the inclusion of these topics in the DSM Plan and, accordingly, Phase II, that discussion should have been raised in Phase II, allowing the Companies' DSM witnesses as well as the other parties who participated properly in Phase II to weigh in and, ultimately, allowing the Commission to decide the proper placement. The Commission's rules and clear delineation between the topics of Phase II and Phase III exist to provide for an orderly and fair process for assessing the Joint 2026 IRP. Allowing an intervenor to submit in Phase III testimony addressing issues already addressed in Phase II makes the deadline established by the Commission moot and is unfairly prejudicial to the Companies' and other intervenors' ability to prepare for an imminent hearing intended to fully address Phase II.

For these reasons, the Companies respectfully request that the Commission strike the portions of the Vote Solar Phase III Testimony identified in Exhibit A.

Dated this 22nd day of October, 2026.

Respectfully submitted,

NEVADA POWER COMPANY  
d/b/a NV ENERGY  
SIERRA PACIFIC POWER COMPANY  
d/b/a NV ENERGY

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## **EXHIBIT A**

1                   **BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

2   Joint Application of Nevada Power Company)                   )  
3   d/b/a NV Energy and Sierra Pacific Power                   )  
4   Company d/b/a NV Energy for approval of Their                   )       **Docket No. 26-05007**  
5   2027-2046 Action Plan and 2027-2029 Energy                   )  
6   Supply Plan.                   )  
7   \_\_\_\_\_ )

8                   **DIRECT TESTIMONY AND EXHIBITS OF RAO KONIDENA**

9                   **ON BEHALF OF VOTE SOLAR**

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11                   **OCTOBER 16, 2026**  
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**List of Exhibits**

Exhibit RK-01: Attestation

Exhibit RK-02: Statement of Qualifications

**I. Introduction**

**Q1. Please state your name and business address.**

**A.** My name is Rao Konidena. My business address is 2309 Auerbach St, Roseville, Minnesota 55113.

**Q2. On whose behalf are you submitting this direct testimony?**

**A.** I am submitting this testimony on behalf of Vote Solar.

**Q3. What is Vote Solar?**

**A.** Vote Solar is a non-profit grassroots organization working to foster economic opportunity, promote energy independence, and fight climate change by making solar a mainstream energy resource across the United States. Vote Solar is described further in the testimony of Claudine Custodio filed in Phase II of this proceeding.

**Q4. By whom are you employed and in what capacity?**

**A.** I am employed by Rakon Energy LLC, as the Chief Executive Officer.

**Q5. Please describe your educational background.**

**A.** I received a Bachelor of Engineering (BE) in Electrical & Electronics Engineering from Bangalore University, a Master of Science in Electrical Engineering (MSEE) from the University of Texas at Arlington, and an MBA from the University of Minnesota.

**Q6. Please describe your experience in utility regulatory matters.**

**A.** I have been an independent consultant for more than eight years, working with consumer and environmental advocates, solar developers, and municipal utilities. Prior to my current position, I worked at Midcontinent Independent System Operator (“MISO”) from September 2003 through May 2018. I started as an Applications Engineer for Planning, where I ran Loss of Load Expectation (“LOLE”) studies, Capacity Benefit

1 Margin calculations, and load deliverability analysis for the MISO Transmission  
2 Expansion Plan (“MTEP”). I was later promoted to Lead, Resource Forecasting, in  
3 2006, and was responsible for a team of engineers running the capacity forecasting  
4 software from the Electric Power Research Institute called Electric Generation  
5 Expansion Analysis System. That forecasting work was used in the MTEP process.  
6 After a promotion to Manager of Resource Forecasting in 2009, I was responsible for  
7 leading Demand Response (“DR”) and Energy Efficiency (“EE”) forecasting for  
8 MTEP. This was the same time that MISO first started calculating Effective Load  
9 Carrying Capability (“ELCC”) for wind resources.

10 I worked in compliance, process, and project management for the entire  
11 Transmission Asset Management (“TAM”) division, as Senior Manager, TAM  
12 Operations from 2013. In this role, my team and I were responsible for division-wide  
13 financial and strategic planning, supporting corporate planning and compliance efforts.

14 I returned to MISO’s Policy Studies department in the Principal Policy Advisor  
15 role in 2015, leading the long-term load forecasting project and DR, EE, and distributed  
16 generation (“DG”) potential study at MISO. Before leaving MISO in 2018, I was  
17 responsible for leading policy efforts on energy storage and distributed energy  
18 resources (“DERs”). I presented to multiple MISO state commissions, including the  
19 Iowa Utilities Board, South Dakota State Public Utilities Commission, and the  
20 Organization of MISO States.

1 **Q7. Have you previously testified before the Public Utilities Commission of Nevada?**

2 A. Yes, I provided written testimony and appeared before the Commission on a previous  
3 Nevada Power and Sierra Pacific Power Integrated Resource Plan in Docket Nos. 21-  
4 06001 and 21-06002.  
5  
6

7 **II. Purpose and Summary of Testimony**

8 **Q8. What is the purpose of your testimony in this proceeding?**

9 A. The purpose of my testimony is to (1) address the capacity accreditation and value of  
10 customer storage compared to the accreditation and value of utility-scale resources  
11 proposed by NV Energy; and (2) compare the capacity value used for NV Energy's Long  
12 Term Avoided Cost ("LTAC") calculations.

13 **Q9. Please summarize your recommendations.**

14 A. I recommend that the Commission:

15 1. Set the generation capacity value of behind-the-meter battery storage at \$9.87 per  
16 kW-month for a 2-hour battery and \$14.10 per kW-month for a 4-hour battery per  
17 kW of demand reduction delivered at the customer's meter.

18 2. Reject the 40 or 70% "Capacity Resource Rate" reduction.

19 3. Set the other value components of the GSR-E and GSR-C at full avoided costs and  
20 otherwise comply with PURPA.  
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### III. NVE's Virtual Power Plant Proposal

#### Q10. Please describe NVE's Virtual Power Plant ("VPP") proposal?

A. The Company proposes to implement a VPP type program as part of its Grid Service Rider for capacity ("GSR-C"). As currently proposed participating customers with a battery are compensated based on a their performance during "load flexibility events" and rates paid based on (1) \$104/kW-year avoided generation capacity costs based on the Company's avoided cost of generation capacity over the Action Planning period; (2) a \$36 or \$33/kW-year avoided transmission capacity; (3) a \$46 or \$43/kW-year avoided distribution costs; and (4) 60% or 30% "portion" of capacity that purportedly represents "the equivalent load carrying capability of the overall aggregated... DR resource, phased dispatch... load diversity, and requirement to cover additional program costs...."<sup>1</sup>

#### Q11. Why do you address the proposed VPP program in your Phase III testimony rather than as part of Phase II covering the DSM program?

A. The company proposes to run its VPP type program through its DSM plan, but that does not mean the program belongs there. I am not a lawyer, but I understand NAC § 704.934 to define the DSM Plan to include energy efficiency and conservation. As used in that regulation, energy efficiency and conservation are programs designed or intended to reduce energy consumption or to shift consumption from one period to another, but not a program that varies compensation based on timing of energy use.<sup>2</sup> To me, a VPP tariff is not a good fit as part of a DSM program and more appropriate as part of a Supply Side Plan. The resources—especially battery storage and portfolios are aggregated resources—are dispatchable resources more like utility scale generation capacity than traditional

<sup>1</sup> Volume 33 pp. 198-202, DSM-94.

<sup>2</sup> NRS 704.7366.

1 energy efficiency programs that reduce total consumption. The compensation under a  
2 VPP depends on the time during which electricity is used and discharged—which seems  
3 to be excluded from a DSM plan under NRS 704.7366.

4 Additionally, VPPs can and should be modeled as options in PLEXOS for  
5 improvements in efficiency of operation and scheduling based on new digital and  
6 computer information system technologies, transactions with independent power  
7 producers, and alternative sources of supply of capacity and electric energy, including  
8 deployment of distributed generation, under NAC §§ 704.9355 and 704.937, rather than  
9 exogenous to and then hard coded as net peak demand assumptions into the modeling.<sup>3</sup>  
10 That is especially so when aggregators are permitted to offer a portfolio of resources to  
11 the utility and receive compensation for performance of the portfolio.

12 Thus, the fact that the utility initially proposed to treat aggregated DERs as a  
13 DSM program does not make it appropriately or exclusively a DSM program.

14 Additionally, most behind the meter customer batteries are paired with solar, making  
15 them Qualified Facilities under PURPA. QF status under PURPA means they are entitled  
16 to minimum compensation under federal law and that the utility and Commission cannot  
17 cap participation and program size as they do with traditional DSM programs. QF  
18 avoided costs are typically developed (to the extent they are developed at all) as part of  
19 Phase III supply plans.<sup>4</sup>

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23 <sup>3</sup> See Application Vol. 9 p. 330-31 (noting that the demand response and demand side management programs “may  
be accounted for as supply resources and reflected in the planning capacity of available resources, but this was not  
the case in this filing” and instead, were used to calculate a net peak demand).

24 <sup>4</sup> NAC 704.9492.

**Q12. Please describe your analysis of the VPP proposal.**

A. The GSR-E and GSR-C are a directionally correct—by recognizing system value of DERs—but the tariffs as proposed are insufficient to unlock and sufficiently compensate DERs, and especially behind the meter storage, as a cost-effective alternative to utility-scale generation capacity. I recommend that the Commission order the following:

- That the utility models aggregations of customer-side DERs as supply side resources rather than or in addition to considering them as part of the DSM plan;
- That the utility acquires all cost-effective aggregations of customer-side DERs, not capped by arbitrary DSM program caps;
- Set a non-discriminatory value for generation capacity from behind-the-meter batteries based on the cost of front-of-the-meter utility-scale batteries on an equivalent ELCC basis.

**Q13. How does the utility consider customer-side dispatchable resources in the resource plan and how does it compare to best practices?**

A. As I note above, the utility considers all customer side resources as part of its DSM plan as net load reductions rather than as supply side alternatives. That is inconsistent with best practices, as reflected by commissions such as the Minnesota Public Utilities Commission that requires utilities to include customer-side DERs as alternatives to utility-scale supply in resource modeling.<sup>5</sup> In 2022 that commission ordered the utility to “develop a modeling construct that enables [the utility], as part of its next resource plan, to model solar-powered generators connected to the company’s distribution grid as a

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<sup>5</sup> In re 2020-2024 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy, Order Points 9(E), 15, pages 34-35 (Minn. Pub. Util. Comm’n, April 15, 2022), [https://mn.gov/deed/assets/puc-approved-irp-xcel-energy\\_tcm1045-529536.pdf](https://mn.gov/deed/assets/puc-approved-irp-xcel-energy_tcm1045-529536.pdf).

resource,” including bundles of energy efficiency and demand response, load flexibility, and other options as selectable resources in system expansion and optimization modeling. In the subsequent resource planning docket the utility found that selecting a set of distributed resources resulted in lower system costs compared to the base scenario without additional DERs.<sup>7</sup> Xcel Minnesota subsequently made plans to acquire approximately 400 MW of distributed battery storage and 440 MW of distributed solar.<sup>8</sup>

**Q14. How does the utility propose to value customer-sited DERs such as battery storage?**

**A.** In general, the proposed GSR-C tariff contains two components: (1) a valuation of services, including generation capacity, energy, transmission capacity, distribution capacity, and line losses; and (2) a method for measuring performance and therefore entitlement to those payments.

As to the valuation of capacity, the company’s proposal determines a value of capacity based on a projection of cost of new entry (CONE) for combined cycle and combustion turbine generation in WECC from Wood Mac used in its Fuel and Purchased Power Price Forecast in Technical Appendix DSM-5 and Volume 7, Section 3.E.<sup>9</sup> The Application contends that those values are a “proxy for the fixed costs of another new or existing power resource” the utility would otherwise acquire.<sup>10</sup> As to the value of other components, Vote Solar witness Custodio addresses the basis and any apparent divergence from underlying costs in her prefiled testimony in Phase II.

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<sup>7</sup> Minnesota PUC Docket No. E002/RP-24-67, Initial Comments of the Distributed Solar Parties, August 9, 2024, at 4, *available at*: <https://minnesotapuc.legistar.com/Legislation.aspx>.

<sup>8</sup> Minnesota Public Utilities Commission, Docket No. E002/RP-24-67, Xcel Energy Initial Comments, August 9, 2024, at 14, *available at*: <https://minnesotapuc.legistar.com/Legislation.aspx>.

<sup>9</sup> NVE Response to VS 3-11(a), (b).

<sup>10</sup> Application Vol. 7 p. 46.

1 The company then applies a 40 or 70% discount to the values. It describes that  
2 discount as “the equivalent load carrying capability of the overall aggregated... DR  
3 resource, phased dispatch... load diversity, and requirement to cover additional program  
4 costs....”.<sup>11</sup> It is unclear what portion, if any, of the discount reflects an effective load  
5 carrying capability difference between the DER and the resources uses as the price  
6 proxy (e.g., the combustion turbines used to determine CONE in the WoodMac capacity  
7 price forecast for generation capacity) and what portion is to cover costs or used as a  
8 shared savings mechanism.

9 **Q15. Why is the valuation of generation capacity from the WoodMac forecast insufficient**  
10 **to constitute avoided costs under PURPA?**

11 A. For two reasons. First, it is not clear what vintage of combustion turbine cost data the  
12 WoodMac forecast was based on. As the company notes, the cost of thermal projects  
13 (i.e., combustion turbines) has increased in recent years because of inflation, supply-  
14 chain disruptions, labor shortages, and market volatility—causing sharp increases in  
15 combustion turbine equipment costs.<sup>12</sup> Wood Mackenzie has noted publicly that a recent  
16 spike in demand for combustion turbines and other components caused a 110 gigawatt  
17 backlog of orders and a six year lead time for combustion turbines, causing a 195%  
18 increase in anticipated 2027 prices alone since 2019.<sup>13</sup> Six months ago, EPRI indicated  
19 that gas turbine prices increased from roughly \$2,000 to \$3,000/kW over the prior six  
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23 <sup>11</sup> Volume 33 pp. 198-201, DSM-94.

24 <sup>12</sup> Application Vol 8 pp. 15-16.

<sup>13</sup> <https://www.woodmac.com/press-releases/gas-turbine-prices-soar-195-as-market-faces-supply-demand-crisis/>

months.<sup>14</sup> That increase does not appear to show up in the capacity cost projects the company used to value DERs or to calculate PURPA avoided costs.

Second, projected CONE does not reflect the actual capacity the utility intends to add in this case. Instead of a proxy gas combustion turbine, the utility proposes to add the following new sources of capacity:<sup>15</sup>

**TABLE REN-1**

| Project Name                                                 | Origination <sup>1</sup>       | Technology <sup>2</sup> | Capacity (MW) | Expected Commercial Operation | Term (Years)   | PPA Price (\$/MWh) | BESS Price (\$/MW-month) | LCOE/LCOS (\$/MWh) <sup>3</sup> |
|--------------------------------------------------------------|--------------------------------|-------------------------|---------------|-------------------------------|----------------|--------------------|--------------------------|---------------------------------|
| Amargosa Energy Center <sup>4</sup>                          | 2024 RFP                       | PV and BESS             | 1200          | 12/31/2030                    | 25 PV, 20 BESS | \$68.47            | \$12,340                 | \$ 130.76                       |
| Boulder Solar III <sup>5</sup>                               | Bilateral                      | PV and BESS             | 128           | 6/1/2028                      | 25 PV, 25 BESS | \$49.95            | \$15,460                 | \$ 125.22                       |
| Castor Storage <sup>6</sup>                                  | 2024 RFP                       | BESS                    | 310           | 5/31/2029                     | 20             | N/A                | \$18,950                 | \$ 103.21                       |
| Commerce Station Energy Storage                              | 2024 RFP                       | BESS                    | 100           | 5/29/2028                     | 20             | N/A                | \$13,950                 | \$ 139.81                       |
| Coyote Energy 1                                              | 2024 RFP                       | PV and BESS             | 600           | 12/31/2030                    | 25 PV, 20 BESS | \$42.99            | \$14,930                 | \$ 108.15                       |
| Dry Lake East Energy Storage II                              | 2024 RFP                       | BESS                    | 150           | 12/31/2027                    | 20             | N/A                | \$13,930                 | \$ 146.13                       |
| Fish Springs Ranch Energy Storage                            | Bilateral                      | BESS                    | 75            | 12/31/2027                    | 20             | N/A                | \$16,550                 | \$ 162.79                       |
| Hot Pot Energy Center                                        | Sleeved for customer agreement | PV and BESS             | 350           | 10/31/2029                    | 20 PV, 20 BESS | \$36.00            | \$13,250                 | \$ 105.31                       |
| Iron Point Energy Center                                     | Sleeved for customer agreement | PV and BESS             | 250           | 12/31/2029                    | 20 PV, 20 BESS | \$36.00            | \$13,250                 | \$ 107.92                       |
| Jersey Valley Solar and Storage                              | 2024 RFP                       | PV and BESS             | 67            | 1/10/2028                     | 25 PV, 20 BESS | \$34.65            | \$13,950                 | \$ 106.05                       |
| Libra Solar & Storage Project Third Amendment <sup>7,8</sup> | Bilateral                      | BESS                    | 200           | 1/1/2048                      | 5              | N/A                | \$24,620                 | \$ 101.45                       |
| Lux Solar Center <sup>9</sup>                                | 2024 RFP                       | PV and BESS             | 125           | 7/1/2028                      | 25 PV, 20 BESS | \$55.95            | \$18,090                 | \$ 135.70                       |
| Nevada Geothermal Portfolio (OKGP) <sup>10</sup>             | Sleeved for customer agreement | Geothermal              | 50            | 12/31/2030                    | 15             | \$107.00           | N/A                      | \$ 107.00                       |
| NGP Blue Mountain Third Amendment                            | 2024 RFP                       | Geothermal              | 30            | 3/31/2027                     | 20             | \$105.00           | N/A                      | \$ 105.00                       |
| North Nevada Geothermal Portfolio                            | Sleeved for customer agreement | Geothermal              | 100           | 12/31/2030                    | 20             | \$105.00           | N/A                      | \$ 105.00                       |
| Sleepy Orange                                                | 2024 RFP                       | PV and BESS             | 500           | 5/31/2030                     | 25 PV, 20 BESS | \$30.90            | \$12,750                 | \$ 89.80                        |
| Southern Bighorn 1 and 2 <sup>11</sup>                       | 2024 RFP                       | PV and BESS             | 400           | 7/15/2028                     | 25 PV, 20 BESS | \$47.23            | \$15,500                 | \$ 117.93                       |
| Trego Grid                                                   | 2024 RFP                       | BESS                    | 200           | 6/30/2028                     | 20             | N/A                | \$15,070                 | \$ 151.52                       |
| White Pine Solar <sup>12</sup>                               | 2024 RFP                       | PV and BESS             | 350           | 12/31/2028                    | 25 PV, 20 BESS | \$28.20            | \$11,350                 | \$ 102.20                       |
| Winston Solar <sup>13</sup>                                  | 2024 RFP                       | PV and BESS             | 400           | 10/1/2029                     | 25 PV, 20 BESS | \$39.60            | \$14,220                 | \$ 111.50                       |

Those resources cost more on a \$/kW-year capacity basis than the WoodMac CONE projections the company proposes to use. For example, the BESS price on a \$/MW-month of the battery portion of those resources range from \$11,350 to \$18,950 per MW-

<sup>14</sup> <https://www.utilitydive.com/news/5-year-waits-and-rising-costs-how-demand-is-redefining-the-gas-turbine-mar/813385/>

<sup>15</sup> Application Vol. 8 Table REN-1 p. 57

month, or \$136.20 to \$227.40 per kilowatt-year, with a weighted average of about \$169 per kW-year for 4-hour storage. By contrast, the company proposes \$104/kW-year as generation capacity.<sup>16</sup> Thus, the proposed capacity value for both the customer-sited DERs and the long term avoided costs do not reflect full avoided costs under PURPA.

**Q16. Should the Company apply the \$227.40/kW-year price of the Castor stand-alone battery storage as the avoided cost of generation to set VPP purchase prices?**

A. That would be a start, but it also needs to address the 40 to 70% reduction it applies as a “Capacity Resource Rate.” There does not appear to be an ELCC basis for that level of reduction. Nor is it applied to the utility-scale resources the company proposes to add. Instead, the company should determine the cost of the utility-scale BESS it proposes to add on a \$/ELCC-weighted kW year basis and apply it to behind the meter VPP battery storage based on the ELCC for that resource. I did that calculation.

**Q17. What does your calculation of the \$/ELCC-weighted kW year of utility-scale BESS and the ELCC of behind the meter VPP show?**

A. My calculation shows that to provide avoided cost compensation for capacity from behind the meter customer battery storage equivalent to what it pays front-of-the-meter utility-scale capacity, NV Energy must pay \$9.87 per kilowatt-month using a 2-hour discharge from the battery. I reach that conclusion by using the company’s disclosed costs in table REN-1 and the ELCC accreditation in ECON-5 Obsidian Plan to determine the cost per ELCC-accredited kW capacity of the 16 proposed utility-scale BESS over the next several years (excluding Libra, which is not proposed to come on line until 2048).

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<sup>16</sup> Page 199, Vol 33.

1 The average of those 16 projects is \$30.93/kW-month of ELCC accredited capacity or  
2 \$14.10/kW-month per kW of 4-hour battery capacity.

3 I then used the company's meter data for the 46 of the 48 homes in its battery  
4 program to determine the equivalent ELCC-weighted cost of capacity for a 2-hour  
5 discharge to derive \$9.87 per kW-month of customer battery capacity. Because days on  
6 which batteries were discharged were hotter on days that the utility called the 48  
7 participating customers' batteries to discharge than on days when it did not, causing  
8 higher behind the meter load unrelated to battery discharge call, I subtracted the  
9 difference in behind the meter load so it was not inappropriately counted against battery  
10 discharge. The result shows 1.3 kW per home in the north and about 0.85 kW discharge  
11 in the south. I note that is roughly one fifth of what the utility's own battery data show as  
12 discharges during events, making my calculated discharge conservative. I then applied  
13 the utility's conversion factor from ECON-12 of 70% for a 2-hour battery to convert the  
14 ELCC for 4-hour utility-scale storage to an equivalent for 2-hour batteries to account for  
15 the fact that the current pilot program events, providing the data I used, were two hours  
16 and the utility proposes to require a 2-hour maximum event.<sup>17</sup>

17 That produces the \$9.87 per kW-month value, or \$118.44 per kW-year. Note that  
18 does not compare directly to the \$104/kW-year proposed in Table DSM-94. My value has  
19 already been adjusted for ELCC, whereas the \$104 value in Table DSM-94 is subject to  
20 the 40 or 70% "Capacity Resource Rate" reduction. Accounting for that adjustment, my  
21 \$118/kW-year compares to the utility's effective capacity value of \$62.40/kW-year.

23 <sup>17</sup> Application Vol. 33 p. 198 Table DSM-94 ("Qualified Events... where each customer participates for a duration of  
24 two hours at the time of et system peak...").

1 **Q18. How much compensation would a typical residential customer with battery storage**  
2 **receive for enrollment and how would it affect the economics of choosing to install a**  
3 **battery?**

4 A. Based on the 46 of the 48 homes enrolled in the utility's pilot program, typical residential  
5 customers would receive between \$8 and \$13 per month. That would increase to about  
6 \$25 per month if the program provided a 4-hour commitment rather than the currently  
7 proposed 2 hours. Based on the average size of the batteries enrolled in the utility's  
8 current pilot, that equates to \$0.72-\$1/kWh-month of battery capacity. For the 4-year  
9 prepaid commitment the utility proposes, that is \$35-48 per kWh of battery capacity as a  
10 pre-paid performance payment. A 4-hour commitment program rather than the 2 hours  
11 the utility proposes would provide \$127 per kWh of battery capacity. Those reflect 4-6%  
12 of the cost of installed battery capacity for a 2-hour program and 15% for a 4-hour  
13 program, assuming an installed cost of \$852 per kWh<sup>18</sup>. Note that these are based only on  
14 the avoided generation capacity; adding avoided transmission and distribution increases  
15 those amounts.

16 **Q19. Why should the Commission implement the GSR-E and GSR-C tariffs under**  
17 **PURPA?**

18 A. Again, I am not a lawyer and am not offering legal opinions. It is my understanding that  
19 the Commission is required by federal law to implement FERC's PURPA rules.<sup>19</sup> Those  
20 rules, in turn, require utilities like NV Energy to buy all energy, capacity, or both put to  
21 them from QFs.<sup>20</sup> Those purchases must be at full avoided cost, which is the incremental

22 <sup>18</sup> Energy Sage, "Storage cost in Nevada" (updated Oct. 4, 2026), average installed cost of \$11,074 for a 13 kWh  
23 system, or \$852/kWh, before incentives. <https://www.energysage.com/local-data/energy-storage-cost/nv/>.

<sup>19</sup> 16 U.S.C. § 824a-3(f)(1).

24 <sup>20</sup> 18 C.F.R. §§ 292.101(b)(2) (purchase means "purchase of electric energy or capacity or both"), 292.303(a),

1 cost of energy or capacity or both which, but for purchasing from one or more qualifying  
2 facilities the utility would generate or purchase from another source.<sup>21</sup> And the utility  
3 must provide standard offer tariffs for such purchases for QFs that are 100 kW or  
4 smaller.<sup>22</sup>

5 A customer with solar and storage smaller than 1 megawatt is a QF without the  
6 need to affirmatively certify with FERC.<sup>23</sup> Thus, regardless of the resource plan  
7 requirements under Nevada law, the Commission is required to implement the federal  
8 requirements that (1) NV Energy buys all capacity that customers with solar and storage  
9 seek to sell to the utility regardless of whether the QF sells energy; (2) through a  
10 standard offer tariff; and (3) that it pays the full amount of capacity it would otherwise  
11 own or procure from another source.<sup>24</sup> It is my understanding that the Commission is not  
12 currently implementing the required standard offer tariff requirement for QFs 100 kW  
13 and smaller.<sup>25</sup>

14 Additionally, PURPA provides an exception to the Federal Power Act's  
15 preemption of state-set rates for the sale of power to NV Energy for resale to customers.  
16 While demand response is within the Commission's jurisdiction, it is not clear that the  
17 Commission can set rates for sale of power (exports) from customers to the utility except  
18 pursuant to PURPA.

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20 <sup>21</sup> 18 C.F.R. §§ 292.101(b)(6), 292.304(b)(2), (4).

21 <sup>22</sup> 18 C.F.R. § 292.304(c)(1).

22 <sup>23</sup> 18 C.F.R. §§ 292.101(b)(1), 292.203(a), (d), 292.204; *see also Lutz Development and Finance Corp.*, 51 FERC  
23 ¶61,078 at 61,172 (1990) (storage is part of QF); *Broadview Solar, LLC*, 174 FERC ¶61,199 (March 19, 2021)  
24 (storage coupled with generation in direct current is part of QF and QF size measured at alternating current send-out  
capacity).

<sup>24</sup> It is also not clear that the Commission can approve rates for sales of power by customer-sited resources to NV  
Energy other than pursuant to PURPA. Those are wholesale power sales, which only FERC can determine the price  
for under the Federal Power Act. PURPA provides an exemption to the FPA and allows states to set rates for sales  
of power but only pursuant to PURPA's provisions.

<sup>25</sup> 18 C.F.R. § 292.304(c); NVE's Response to VS 2-2 (no standard offer contracts).

1 **Q20. Are the GSR-E and GSR-C tariffs consistent with PURPA?**

2 A. No, for several reasons. First, as I note above, the compensation for capacity is  
3 inconsistent with the marginal cost of new capacity the utility is buying from utility-  
4 scale, front-of-meter storage. That discriminates against QFs, which is contrary to 18  
5 C.F.R. § 292.304(a)(1)(ii). Second, other components of the value of distributed  
6 resources—energy and distribution—are less than full avoided costs, as Ms. Custodio’s  
7 testimony notes. Third, as currently proposed the GSR-E and GSR-C tariffs would be  
8 implemented through a capped-budget DSM program, limiting the program to a small  
9 number of customers. It’s my understanding that PURPA rights are available to all QFs;  
10 the utility cannot cap participation.

11 **Q21. Please summarize your testimony.**

12 A. First, I recommend that the Commission sets the generation capacity value of behind-the-  
13 meter battery storage at \$9.87 per kW-month for a 2-hour battery and \$14.10 per kW-  
14 month for a 4-hour battery per kW of demand reduction delivered at the customer's  
15 meter. Second, I recommend the Commission reject the 40 or 70% “Capacity Resource  
16 Rate” reduction. Third, I recommend that the Commission sets the other value  
17 components of the GSR-E and GSR-C at full avoided costs and otherwise comply with  
18 PURPA.

19 **Q22. Does this conclude your testimony?**

20 A. Yes.  
21  
22  
23  
24

**Vote Solar  
Konidena Direct Testimony  
Docket No. 26-05007**

**Affirmation of Rao Konidena  
Exhibit RK-01**

**Affirmation**

Pursuant to the requirements of NRS 53.045 and NAC 703.710, I, Rao Konidena, swear that I am the person identified in the attached Direct Testimony and that such testimony was prepared by me or under my direct supervision, that the answers and information set forth therein, my answers thereto would, under oath, be the same.

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

DATED: 10/12/2026

SIGNED: Rao Konidena

Rao Konidena

**Vote Solar  
Konidena Direct Testimony  
Docket No. 26-05007**

**Statement of Qualifications of Rao Konidena  
Exhibit RK-02**

# RAO KONIDENA

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## Professional Summary

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Independent energy regulatory consultant and expert witness with 20+ years of experience spanning transmission planning, wholesale electricity market design, and distributed energy resource integration. Has filed testimony and affidavits before **state commissions in 10+ jurisdictions and the Federal Energy Regulatory Commission**, primarily on behalf of consumer advocates, environmental intervenors, and market participants. Former MISO Principal Advisor who led demand-side potential and grid-scale energy storage studies. Co-author of a Wiley graduate textbook on modern electricity systems.

## Areas of Expertise

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- Transmission Planning & CPCN Review
- Distributed Energy Resources (DER)
- Demand Response & FERC Order 2222
- Non-Wires Alternatives & Grid-Enhancing Tech
- Cost Allocation & Cost Causation
- Energy Storage Tariffs & Deployment
- Resource Adequacy & Capacity Markets
- Generator Interconnection (MISO/PJM)

**Analytical Capabilities:** Builds Python-based analytical tools for multi-ISO LMP analysis, benefit-cost modeling, and RTO market-data extraction across PJM, MISO, NYISO, SPP, CAISO, and ISO-NE.

## Expert Testimony & Regulatory Engagements

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*Testimony, affidavits, and regulatory analysis filed through Rakon Energy LLC (2018–present), organized by jurisdiction.*

### Federal Energy Regulatory Commission (FERC)

- **Voltus, Inc** — Affidavit on SPP's multi-nodal aggregation. Docket No. ER22-1697.
- **Kentucky Public Service Commission (via Engleman Fallon, PLLC)** — Expert testimony in a transmission cost allocation complaint. Docket No. EL25-67-000. [\[eLibrary\]](#)
- **Office of the People's Counsel of D.C. (OPC-DC)** — Affidavit on PJM's Reserves Pricing Proposal. [\[filing\]](#)
- **Municipal utilities (Wisconsin & Missouri)** — Affidavit on MISO's Resource Adequacy construct.
- **Missouri Joint Municipal Electric Utilities Commission, Missouri River Energy Services & WPPI Energy** — Affidavit on MISO's External Resource Zone proposal. Docket No. ER18-1173-001. [\[eLibrary\]](#)

### Pennsylvania Public Utility Commission

- **PA Office of Consumer Advocate** — PPL Electric Utilities – Sugarloaf 500/230 kV Transmission Line Project. Docket Nos. A-2026-3061547, P-2026-3061609, and A-2026-3061549 et al.
- **PA Office of Consumer Advocate** — PPL Electric Utilities – LON Susquehanna-Harwood. Docket No. A-2025-3059443.
- **PA Office of Consumer Advocate** — Utility rate case. Docket No. R-2024-3047068. [\[filing\]](#)
- **PA Office of Consumer Advocate** — Transmission line rebuild CPCN. Docket No. A-2022-3037374 (begins p. 198). [\[filing\]](#)
- **PA Office of Consumer Advocate** — Policy proceeding — Utilization of Storage Resources as Electric Distribution Assets. Docket No. M-2020-3022877 (begins p. 18). [\[filing\]](#)

- **PA Office of Consumer Advocate** — Ongoing generic electrical engineering support on transmission, distribution, and miscellaneous electric issues.

#### **Maryland Public Service Commission**

- **MD Office of People's Counsel** — NextEra Energy Transmission MidAtlantic — CPCN for 500 kV line, MidAtlantic Resiliency Link Project (Allegany & Garrett Counties). PSC Case No. 9857.
- **MD Office of People's Counsel** — Carroll-Germantown 230 kV line and Potomac Edison Messick Road-Ridgeley 138 kV rebuild CPCNs. PSC Case Nos. 9803 & 9818.
- **MD Office of People's Counsel** — Transmission line rebuild CPCN. PSC Case No. 9698 (filed Sept. 13, 2023). [\[case\]](#)

#### **Massachusetts Department of Public Utilities**

- **MA Attorney General's Office, Office of Ratepayer Advocacy (via Center for Renewables Integration)** — Energy storage tariffs — Eversource (DPU 23-126), National Grid (DPU 23-115), Unitil (DPU 23-117). [\[dockets\]](#)

#### **Illinois Commerce Commission**

- **Citizens Utility Board & Environmental Defense Fund** — Ameren Transmission Co. of Illinois / Ameren Illinois — transmission line CPCN. Docket No. 24-0088. [\[docket\]](#)
- **Environmental Law & Policy Center & Citizens Utility Board** — Ameren Illinois / Ameren Transmission Co. — transmission line CPCN. Docket No. P2023-0658. [\[docket\]](#)

#### **California Public Utilities Commission**

- **San Luis Obispo Mothers for Peace** — PG&E recovery of Diablo Canyon extended-operation costs (Sept. 2023–Dec. 2025) and 2025 Volumetric Performance Fees. Proceeding A.24-03-018. [\[filing\]](#)
- **San Luis Obispo Mothers for Peace** — Proposed extension of Diablo Canyon Power Plant. Proceeding R.23-01-007. [\[filing\]](#)

#### **North Carolina Utilities Commission**

- **NC WARN** — Duke Energy Carolinas Biennial Consolidated Carbon Plan & IRP. Docket No. E-100, SUB 190. [\[filing\]](#)
- **NC WARN** — Duke Energy Carolinas rate case. Docket No. E-7, SUB 1276. [\[filing\]](#)

#### **Colorado Public Utilities Commission**

- **CO Office of the Utility Consumer Advocate** — Expert testimony on a utility distribution system plan. Proceeding No. 24A-0547E.

#### **Minnesota PUC & Kansas Corporation Commission**

- **Voltus, Inc (demand response aggregator)** — Aggregator of Retail Customers — MN PUC Docket No. E999/CI-22-600; Demand Response Aggregator — KS Docket No. 23-EKCE-588-TAR. [\[KS filing\]](#)
- **Vote Solar** — Xcel/IOU IRP filing. MN PUC Docket No. E002/RP-19-368. [\[filing\]](#)

#### **Public Utilities Commission of Nevada**

- **Vote Solar** — IOU IRP filings. Docket Nos. 21-06001 and 21-06002. [\[filing\]](#)

#### **Public Service Commission of Wisconsin**

- **Environmental Law & Policy Center** — MISO Multi-Value Project (MVP) transmission line CPCN. Docket No. 5-CE-146. [\[filing\]](#)

### **Consulting & Advisory Engagements**

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#### **Litigation, Agency & Policy Support**

- Earthjustice — Technical analysis on anticipated DOE action regarding the Campbell plant (MI) and Schahfer and Culley plants (IN).
- Earthjustice, Sierra Club, NRDC & EDF — Opinion on DOE/Energy Secretary Chris Wright's August 20, 2025 order to MISO and Consumers Energy.
- Earthjustice — Technical analysis of the NYISO reliability planning process.
- Georgia Public Service Commission — Engaged as Battery Energy Storage System (BESS) consultant.
- Environmental Defense Center (for Mothers for Peace) — Report on the need for Diablo Canyon, submitted to the California Coastal Commission.
- Advanced Energy United (via Center for Renewables Integration) — Report on opportunities for DERs in organized markets.
- Advanced Energy Economy & NRDC Sustainable FERC Project — Monitoring of MISO's FERC Order 2222 implementation.
- Voltus, Inc — Representation at RTO stakeholder committees on FERC Order 2222.
- Energy Storage Association — Advocacy support at MISO on FERC Order 841 compliance.

### **Developer & Market-Participant Advisory**

- Commercial real estate firm's renewable division — Impact of RTO market reforms on existing PPAs and interconnection agreements.
- Spanish renewable developer (via CRI) — MISO/PJM interconnection queue evaluation for solar/storage sites.
- Minnesota solar developer — DER and BESS development opportunities in MISO.
- Community Solar Garden developer — MISO DER Affected Systems Study process.
- Independent Power Producer — MISO seasonal resource adequacy construct and its PPA impacts.
- Renewable developer — MISO Generator Interconnection Queue and seasonal capacity-credit impacts across study cycles.
- Technology companies — Representation at PJM and navigation of MISO market rules for data center interconnection.

### **Training & International**

- USEA workshop — US energy, capacity, and retail markets for the Independent Electricity Market Operator Philippines (IEMOP).
- NARUC International Peer Review — DER and Demand Side Management plan review for Central American regulators.
- USEA / USAID / Power Africa — Ancillary services best practices, Eastern Africa regional workshop.
- Tuatara team — DER training for Colombia's grid operator XM; ESTA International — energy storage benefits for Mexican regulator CRE.

### **Professional Experience**

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**Rakon Energy LLC** • Roseville, MN

2018 – Present

*Founder & Principal*

- Founded an independent consultancy providing expert testimony, affidavits, and technical analysis on transmission planning, wholesale markets, resource adequacy, and distributed energy resources.
- Filed testimony and affidavits before FERC and 11 state commissions on behalf of consumer advocates, environmental intervenors, municipal utilities, and market participants (detailed above).

- Advise developers, independent power producers, and technology companies on MISO/PJM interconnection, capacity accreditation, and market rules; deliver regulator training with USEA, NARUC, and USAID.

## **Midcontinent Independent System Operator (MISO) • Eagan, MN**

Aug 2015 – May 2018

### *Principal Advisor, Policy Studies*

- Recognized as an expert on energy storage and DERs from an economic transmission planning perspective.
- Project manager for the long-term independent load forecast and demand response / energy efficiency / distributed generation potential study.
- MISO representative on the DOE US DRIVE Grid Interaction Technical Team.

### *Senior Manager, Transmission Asset Management Operations*

Feb 2013 – July 2015

- Partnered with the division lead on strategic initiatives and operating plans.
- Chaired the Economic Modeling Framework Working Group of international grid operators (GO-15).

### *Manager, Resource Forecasting (started as Engineer II)*

Sep 2003 – Jan 2013

- Directed MISO's Demand Response & Energy Efficiency potential study (with Global Energy Partners).
- Directed the MISO Energy Storage Study identifying economic potential for grid-scale storage, advising utilities, asset owners, and investors.
- Owned analytical assessments meeting MISO's FERC compliance obligations (e.g., market-based rates).
- Supported state regulators and the MISO Board with technical analysis of policy drivers.

## **PwrSolutions, Inc. • Dallas, TX**

May 2001 – Aug 2003

### *Student Intern & Electrical Engineer (Consulting)*

- Executed generator interconnection studies for Independent Power Producer clients.
- Analyzed future generator and transmission needs in the Eastern Interconnection.

## **Education**

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**MBA, Global Executive Program** — University of Minnesota, Carlson School of Management 2011  
Emphases: Strategic Management, International Business. Capstone: marketing mobile EV charging services in the Singapore market.

**M.S., Electrical Engineering** — University of Texas at Arlington, Energy Systems Research Center 2002  
Thesis: Economic Analysis of Distributed Generation (Photovoltaics and Fuel Cells).

**B.E., Electrical & Electronics Engineering** — Bangalore University 1998

## **Publications, Boards & Recognition**

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- Co-author, *Modern Electricity Systems: Engineering, Operations, and Policy to Address Human and Environmental Needs* (Wiley, 2022) — graduate-level textbook.
- Author of multiple publications in The Electricity Journal, Renewable Energy World, and other industry journals; regular Substack contributor for commissioners and regulatory staff.
- President, Board of Directors, Center for Renewables Integration (Dec 2023 – present).
- Board of Directors, Ever Green Energy (Sep 2019 – present).

## **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury under the laws of the State of Nevada that I delivered true and correct copies of the forgoing DIRECT TESTIMONY OF RAO KONIDENA the following persons via the method of service noted.

DATED: October 16, 2026

/s/ Bradley Heusinkveld

Bradley Heusinkveld  
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## **CERTIFICATE OF SERVICE**

**CERTIFICATE OF SERVICE**

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

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