

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 joint 2025-2044 integrated resource plan, for the three year Action Plan period 2025-2027, and the Energy Supply Plan period of 2025-2027.

Docket No. 24-05____

VOLUME 1 OF 29

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

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TRANSMITTAL LETTER



May 31, 2024

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

RE: Docket No. 24-05___ - 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 joint triennial integrated resource plan (addressing the twenty-year planning period 2025 through 2044 and action plan period 2025 through 2027) and energy supply plan (addressing the three year period 2025 to 2027).

Dear Ms. Osborne:

Enclosed for filing please find the Joint Application made by and on behalf of Sierra Pacific Power Company d/b/a NV Energy and Nevada Power Company d/b/a NV Energy (the “Companies” or “NV Energy”) seeking approval of their joint triennial integrated resource plan (addressing the 20-year planning period 2025 to 2044 and action plan period 2025 to 2027) (“2024 Joint IRP”) and energy supply plan (addressing the three year period 2025 to 2027) (“2024 ESP”). The entire filing is contained in 29 volumes, which are numbered sequentially and are individually indexed. A complete index of the entire filing by volume is attached to this transmittal letter.

Additional Copies: To facilitate the review of the filing by the Public Utilities Commission of Nevada (“Commission”) and its policy advisors, courtesy copies are being printed and will be provided to both the Carson City and Las Vegas offices as they become available. Please advise me, using the contact information below, as to how many printed versions should be delivered to each location. As always, additional copies of the print version of the filing will be provided upon request.

Workpapers: Electronic copies of the filing, along with the executable electronic copies of load forecasting and demand-side plan workpapers will be delivered to the Regulatory Operations Staff (“Staff”) and the Attorney General’s Bureau of Consumer Protection (“BCP”) in both their Carson City and Las Vegas offices.

Confidentiality: Certain information set forth in the Narrative, supporting testimony and Technical Appendices is commercially sensitive and/or trade secret information subject to protection pursuant to NRS § 703.190. Specifically, the confidential information in this filing, along with the basis for the assertion of confidentiality, is set forth below.

Accompanying this transmittal letter are portions of the filing that are to be kept under seal pursuant to NAC § 703.527 *et seq.* This information is printed on pink paper and transmitted in a sealed envelope, appropriately marked, and contains the unredacted versions of the following:

Customer Specific Information. The Companies' load forecasts include reports of future load provided directly by customers. This information is highly confidential to the providing customers and is provided to the Companies on condition that they maintain confidentiality. Portions of the workpapers supporting Technical Appendix LF-1 to the 2024 Joint IRP qualify for confidential treatment under NRS § 703.190. Technical Appendix LF-6 contains third-party proprietary information and is being provided confidentially.

Fuel and Purchased Power Price Forecasts. The Companies have prepared price forecasts for fuel and purchased power for the 2024 Joint IRP and the 2024 ESP. The following figures in the fuel and purchased power narrative in the 2024 Joint IRP are confidential and have been redacted in the public version of the filing:

- Figure PF-2 – Annual Average Gas Price Forecast
- Figure PF-3 – Average Market Implied Heat Rate
- Figure PF-4 – Average Annual Power Price Forecast - Mead
- Figure PF-5 – Base, High and Low Gas Price Forecast - Rockies
- Figure PF-6 – Base, High and Low Gas Price Forecast – Alberta (AECO)
- Figure PF-7 – Base, High and Low Power Price Forecast - Mead
- Figure PF-8 – Projected Capacity Prices

In addition, in the 2024 Joint IRP, confidential Technical Appendix item FPP-1 provides additional confidential fuel price information.

In the 2024 ESP, the following figures in the fuel and purchased power narrative are confidential and have been redacted in the public version of the filing:

- Figure ESP-29 – Natural Gas Price Forecasts
- Figure ESP-30 – Natural Gas Price Forecast (Rockies)
- Figure ESP-31 – Natural Gas Price Forecast (Alberta)
- Figure ESP-32 – Power Price Forecast (Mead-on-Peak)

In addition, the 2024 ESP market fundamentals narrative reproduces the above figures, and the gas procurement plan lists confidential pricing values. Technical Appendix FPP-1 contains confidential fuel price information.

Fuel and purchased price forecasts qualify for confidential treatment under NRS § 703.190. They derive independent economic value from not being generally known and disclose the Companies' views and expectations of the relevant markets. This information is not known outside the Companies and its distribution is limited within the Companies. Releasing this highly sensitive information would disadvantage the Companies by limiting their ability to foster competition among prospective suppliers, compromising the Companies' negotiating position and reducing its bargaining leverage. Publication of this information would unfairly advantage competing coal buyers and impair the Companies' ability to achieve the most favorable pricing and terms and conditions from suppliers on behalf of its customers

Gas Premiums. In the 2024 Joint IRP, Fuel Supply narrative contains confidential gas price premiums. This confidential information is commercially sensitive and/or trade secret information that derives independent economic value from not being generally known. Disclosure of this confidential information to any third party would adversely affect the Companies' ability to obtain favorable terms from its gas suppliers.

Operational Data. A comprehensive IRP analysis necessarily relies on confidential information regarding the performance characteristics of the Companies' generating fleet. In the 2024 Joint IRP, the following Technical Appendix items are provided in redacted form in the public version of the filing.

- GEN-1 – Unit Characteristics Table
- GEN-3 – Generation Brownfield Study
- ECON-3 – Average Generation Costs
- ECON-4 – Production Cost Summaries
- ECON-6 – Capital Projects
- ECON-10 – Candidate Resources
- ECON-15 – DSM Cases
- ECON-16 – No Greenlink Case

Similar information is included in Technical Appendix ECON-1 in the 2024 ESP.

Technical Appendices GEN-1 and GEN-3 are marked as confidential. Technical Appendix GEN-1 includes the Generating Unit Characteristics Table that provides characteristics used in the dispatch of the Companies' generating units. Technical Appendix GEN-3 includes cost projection details for potential future generating units. Public release of this information would allow parties bidding energy to the Companies to price their units based on NV Energy's costs, which would adversely affect NV Energy's customers. Tables GEN-3, GEN-4, GEN-6, and GEN-7 within the Generation Section of the Supply Plan contain confidential projects cost information that is currently in development, subject to on-going bids, or is being negotiated.

Generation unit characteristics and similar operational data qualify for confidential treatment under NRS § 703.190. The information in these Technical Appendices derive independent economic value from not being generally known. This information discloses the Companies' views and expectations of the relevant markets and its future procurement opportunities. This information is not known outside the Companies and its distribution is limited within the Companies. Releasing this highly sensitive information would disadvantage the Companies by limiting their ability to foster competition among prospective energy suppliers and buyers; compromising the Companies negotiating positions and reducing their bargaining leverage. Publication of this information would unfairly advantage competing market participants and impair the Companies' ability to achieve the most favorable pricing and terms and conditions from suppliers on behalf of its customers.

Economic Analysis. Technical Appendices ECON-3, ECON-4, ECON-6, ECON-10, ECON-15, and ECON-16 contain confidential information. Technical Appendix ECON-3 contains unit-specific cost data, which is market sensitive data, of each of the Companies' generators. Costs specific to each generator are commercially sensitive information. Disclosure of such information could put the Companies at a competitive disadvantage. Technical Appendix ECON-4 contains proprietary forecast price data obtained from a third party. Technical Appendices ECON-6 and ECON-10 contain sensitive projected capital cost information related to future resources. Public disclosure could harm the Companies' ability to negotiate the best priced contracts moving forward and would put the Companies at a competitive disadvantage. Technical Appendices ECON-15 and ECON-16 each contain third-party proprietary forecast price data and sensitive projected capital cost information related to future resources, as required for the unique analyses performed in this IRP related to DSM and the No Greenlink Illustrative case.

Forecasted Financial Data. A comprehensive IRP analysis necessarily relies on confidential information regarding the impact of the Preferred Plan on the Companies' financial performance. That information is discussed in the narrative of the Financial Plan. The following figures in the Financial Plan narrative are confidential and have been redacted in the public version of the filing.

- Figure FP-3 – Nevada Power Summary of External Debt Financing
- Figure FP-4 – Sierra Summary of External Debt Financing
- Figure FP-11 – Nevada Power Funds from Operations to Total Debt
- Figure FP-12 – Nevada Power EBITDA Interest Coverage
- Figure FP-13 – Nevada Power Total Debt to Total Capital
- Figure FP-14 – Nevada Power Cash from Operations to CAPEX
- Figure FP-15 – Sierra Funds from Operations to Total Debt
- Figure FP-16 – Sierra EBITDA Interest Coverage
- Figure FP-17 – Sierra Total Debt to Total Capital
- Figure FP-18 – Sierra Cash from Operations to CAPEX

Certain figures in the Financial Plan of the narrative are confidential. Specifically, Figures FP-3 and FP-4 in the External Financing Requirements section of the Financial Plan and Figures FP-11 through FP-18 in the Credit Quality section of the Financial Plan should be treated as confidential. Sierra's and Nevada Power's debt is publicly traded, and the information identified in the figures above has not been previously disclosed to the public. Public disclosure of this information could influence investor's view of the underlying credit quality of and debt pricing for the Companies. The portion of Mr. Behrens's testimony presenting the Companies' credit metrics is similarly confidential. Exhibit Behrens-Direct-2 is also confidential because it consists of third-party, Moody's, Investors Service, Inc. copyrighted material. Reproduction and dissemination of the material is explicitly prohibited.

The financial analysis accompanying the 2024 Joint IRP qualifies for confidential treatment under NRS § 703.190. It derives independent economic value from not being generally known

and discloses the Companies' views and expectations of the relevant markets. This information is not known outside the Companies and its distribution is limited within the Companies. Moreover, the financial analysis contains non-public financial data.

Renewable Projects. Central to this 2024 Joint IRP analysis is the issuance, analysis and results of the 2024 Renewable RFP. The success of a large competitive solicitation necessarily relies on confidential treatment of certain information regarding renewable projects and pricing. That information is discussed in the following Technical Appendix items:

- REN-3-DLE(a) Dry Lake East PPA (Redacted)
- REN-3-DLE(b) Dry Lake East Due Diligence Summary
- REN-4-BS3(a) Boulder Solar III PPA (Redacted)
- REN-4-BS3(b) Boulder Solar III Due Diligence Summary
- REN-5-LS(a) Libra PPA (Redacted)
- REN-5-LS(b) Libra Due Diligence Summary
- REN-6-CS2(a) Corsac Generating Station 2 PPA (Redacted)
- REN-6-CS2(b) Corsac Generating Station 2 Due Diligence Summary
- REN-8 Bid Scores Summary 2023 OR RFP

Technical Appendices REN-3-DLE(a) Dry Lake East PPA, REN-4-BS3(a) Boulder Solar III PPA, REN-5-LS(a) Libra PPA, and REN-6-CS2(a) Corsac Generating Station 2 PPA contain a redacted Exhibit that lists approved vendors. This information is commercially sensitive and its disclosure can result in harm to the Companies, the Companies' contractual counterparties, and the vendors either included or excluded from the list.

The Technical Appendices containing the due diligence summaries are confidential because, if publicly disclosed, could provide an unfair market advantage to competitors and future bidders by showing the Companies' internal analysis on projects. Technical Appendix REN-8 contains 2023 RFP bid information from non-winning bids submitted to the Companies under confidentiality agreements. Table REN-8 within the Supply Plan also reflects confidential bid information from candidate resources.

DSM Plan. Technical Appendix DSM-21, M&V Report Energy Smart Schools, contains personal information of individuals which has been redacted.

Workpapers. Courtesy copies of electronic files supporting this Joint Application are enclosed with this letter and will also be delivered to the Regulatory Operations Staff and the Bureau of Consumer Protection. The workpapers supporting the confidential portions of the filing listed above are identified as confidential.

Pursuant to NAC § 703.5274(1), one unredacted copy of the confidential information will be filed with the Commission's Secretary in a separate envelope stamped "confidential." Redacted versions of confidential information will be submitted for processing and posting onto the Commission's public website.

Pursuant to NAC § 703.5274(2), the Companies hereby request that the above-described information not be disclosed to the public. The Companies request that this information remain confidential for a period of five years after which the information may be destroyed or returned.

Confidential treatment of the above-described information will not impair the ability of the Regulatory Operations Staff or the Bureau of Consumer Protection to fully investigate the Companies' proposals. Pursuant to NAC § 703.527 and § 703.5274, Staff and BCP will execute a protective agreement for this case and will then be immediately provided unredacted copies of the filing.

Should you have any questions regarding this filing, please contact me at 775-834-3470 or at Roman.Borisov@nvenergy.com.

Sincerely,

/s/ Roman Borisov
Roman Borisov
Senior Attorney

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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing **JOINT APPLICATION FOR APPROVAL OF THE 2024 JOINT INTEGRATED RESOURCE PLAN OF NEVADA POWER COMPANY D/B/A NV ENERGY AND SIERRA PACIFIC POWER COMPANY D/B/A/ NV ENERGY** in Docket No. 24-05___ upon the persons listed below by electronic mail:

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DATED this 31st day of May, 2024.

/s/Erin Moore
Erin Moore
Paralegal
Nevada Power Company
Sierra Pacific Power Company