

**SIERRA PACIFIC POWER COMPANY  
d/b/a NV Energy**

**ELECTRIC DEPARTMENT**

**BEFORE THE**

**PUBLIC UTILITIES COMMISSION OF NEVADA**

In the Matter of the Application by SIERRA PACIFIC )  
POWER COMPANY D/B/A NV ENERGY, filed )  
pursuant to NRS 704.110(3) and NRS 704.110(4), )  
addressing its annual revenue requirement for )  
general rates charged to all classes of electric )  
customers. )

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Docket No. 19-06\_\_\_\_\_

**VOLUME 1 of 18**

**Transmittal Letter  
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Certificate of Service**

**Recorded Test Year ended December 31, 2018  
Certification Period ended May 31, 2019**

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**Sierra Pacific Power Company**  
d/b/a NV Energy  
Electric Department

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# Transmittal Letter

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June 3, 2019

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

RE: Sierra Pacific Power Company d/b/a NV Energy's Application addressing its annual revenue requirement for general rates charged to all classes of electric customers, in Docket No. 19-06\_\_

Dear Ms. Osborne:

Pursuant to Nevada Revised Statutes ("NRS") § 704.110(3)(a), by the first Monday in June every 36 months, Sierra Pacific Power Company d/b/a NV Energy ("Sierra" or "Company") must file an application requesting a review of its general rate. Sierra has prepared a full and complete general rate review filing as required by the statute. Sierra is requesting that the Commission find that it has met all statutory and regulatory requirements by filing this triennial general rate review application, and *approve rates that will collect \$5 million less in annual revenue* than is generated by current rates.

Enclosed for filing please find a USB Flash Drive electronic device, which contains Sierra's 2019 **Application Addressing Its Electric Utility Annual Revenue Requirement**. Chapter 703 of the Nevada Administrative Code ("NAC") sets forth the body of regulations implementing NRS § 704.110. Specifically, NAC § 703.2201 through NAC § 703.2481, inclusive, prescribe the manner in which general rate applications are to be prepared and filed. The statements and schedules that accompany this application demonstrate that Sierra's annual revenue requirement for its core operations should actually increase by \$5.3 million. Despite this showing, Sierra asks the Commission to approve an unprecedented request, to implement rates designed to collect \$5 million less in annual revenue.

The entire filing is contained in 18 volumes, which are numbered sequentially and are individually indexed. Volumes 10 through 14 of 18 set forth responses to the Commission's Master Data Request ("MDR") in accordance with NAC 703.2208. Workpapers are provided in volumes 15 to 18 of 18. These materials, along with all required application exhibits, statements, schedules, and prepared direct testimony, are incorporated into and together constitute the Company's prima facie direct case. A complete index of the entire filing by volume is attached to this transmittal letter.

To facilitate the review by the Commission and its policy advisors, in addition to the electronic filing, courtesy copies of the entire filing are being printed and will be provided to both the Carson City and Las Vegas offices as they become available. As always, additional copies of either the print or electronic versions of the filing, including executable electronic copies of schedules and statements, MDR responses and workpapers, will be provided upon request.

The Commission's Regulatory Operations Staff ("Staff") and the Attorney General's Bureau of Consumer Protection ("BCP") will be served today with electronic copies of the filing, along with the executable electronic copies, schedules, and statements, as well as responses to all MDRs. In addition, Sierra is preparing hard copies for Staff's Carson City office and the Las Vegas office. Similarly, the BCP will have hard copies for their Las Vegas office, and for their Carson City office. These will be delivered as they become available.

Accompanying this transmittal letter are excerpts of the filing that are to be kept under seal pursuant to NRS § 703.196 and NAC § 703.527 *et seq.* This information is contained in a sealed envelope, appropriately marked, and contains the unredacted versions of the following:

- (a) Portions of Statement J, Statement J workpapers, and Statement O workpapers contain information regarding the annual billing units, revenues, and/or usages of discrete customers. To maintain the confidentiality of the customers' information, Sierra has designated this information as confidential pursuant to NRS § 703.196 and NAC § 703.5274. The public version of the filing will include redactions of this confidential information.
- (b) As is indicated above, the filing includes responses to the Commission's MDRs. Attachment 1 to MDR 27 (Operating Plans) contains forecasted financial information that is confidential pursuant to NRS § 703.196 and NAC § 703.5274. Attachments 1 to MDR 28 (Budgets) contain forecasted financial information that is confidential pursuant to NRS § 703.196 and NAC § 703.5274. Attachments 1 through 12 to MDR 29 (Monthly Budget-to-Actuals) contain forecasted financial information that is confidential pursuant to NRS § 703.196 and NAC § 703.5274. Attachments 1 through 2 to MDR 46 (Rate Base) contain trade secrets and customer specific information that is confidential pursuant to NRS § 703.196 and NAC § 703.5274. Confidential attachments to MDRs 48-50 contain costs for land and land rights that, if made public, could negatively affect NV Energy's ability to negotiate in the future the lowest cost for land rights on behalf of its customers. Sierra has designated this information as confidential pursuant to NRS § 703.196 and NAC § 703.5274. Attachment 2 to MDR 94 (Dues, Industry Associations) contains third-party financial data that is not publicly available and was provided to Sierra on condition that confidentiality be maintained. Sierra has designated this information as confidential pursuant to NRS § 703.196 and NAC § 703.5274. Attachment 1 to MDR 98 (Maps) contains maps of transmission and distribution systems designated as confidential pursuant to NRS § 239C.210(2)(b), NRS § 703.196, and NAC § 703.5274. The public version of the filing will include redactions of this confidential information.

Pursuant to NAC § 703.5274(2), Sierra requests that the above-described information not be disclosed to the public and that this information remain confidential for a period of five years, after which the Commission may return or destroy these materials, whichever is most convenient. Protective agreements with Staff and BCP have been sent today and once executed Staff and BCP will be served with confidential unredacted versions of the above-described material.

Ms. Osborne  
June 3, 2019  
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Please also note that NRS § 704.110(2) provides that the Commission must issue a written order approving or disapproving, in whole or in part, a general rate review application within 210 days of its filing or the application is deemed approved. Thus, the “deemed approved” date for this Application is December 30, 2019.

Should you have any questions regarding this filing, please contact me at (775) 834-5692 or MGreene@nvenergy.com.

Respectfully submitted,

/s/Michael Greene  
Michael Greene  
Deputy General Counsel

Enclosures

cc: *Asst. Staff Counsel*, Tammy Cordova, *BCP Counsel*, Ernest Figueroa

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d/b/a NV Energy  
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# Certificate of Service

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing filing of **SIERRA PACIFIC POWER COMPANY D/B/A/ NV ENERGY** in Docket No. 19-06\_\_\_ upon the persons listed below by the following:

**HAND DELIVERED:**

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bcpserv@ag.nv.gov

DATED this 3<sup>rd</sup> day of June, 2019.

/s/Lynn D’Innocenti  
Lynn D’Innocenti  
Senior Legal Administrative Assistant  
Nevada Power Company  
Sierra Pacific Power Company