

# BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Annual Deferred Energy Accounting Adjustment Application of Nevada Power Company d/b/a NV Energy for the 12-month period ending December 31, 2023, reset the Temporary Renewable Energy Development Rate, reset all components of the Total Renewable Energy Program Rate, reset the Base Energy Efficiency Program Rates, reset the Base Energy Efficiency Implementation Rates, reset the Energy Efficiency Program Amortization Rate, reset the Energy Efficiency Implementation Amortization Rate and reset the Expanded Solar Access Program rate.

**Docket No. 24-03** \_\_\_\_

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### NEVADA POWER COMPANY D/B/A NV ENERGY

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## **TRANSMITTAL LETTER**



March 1, 2024

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

RE: Annual Deferred Energy Accounting Adjustment Application of Nevada Power Company d/b/a NV Energy for the 12-month period ending December 31, 2023, reset the Temporary Renewable Energy Development Rate, reset all components of the Total Renewable Energy Program Rate, reset the Base Energy Efficiency Program Rates, reset the Base Energy Efficiency Implementation Rates, reset the Energy Efficiency Program Amortization Rate, reset the Energy Efficiency Implementation Amortization Rate and reset the Expanded Solar Access Program rate.

Dear Ms. Osborne:

Enclosed for filing with the Public Utilities Commission of Nevada ("Commission") please find the Annual Deferred Energy Accounting Adjustment Application of Nevada Power Company d/b/a NV Energy ("Nevada Power" or the "Company") for the 12-month period ending December 31, 2023 (the "Application"). Through this filing the Company seeks to reset the Temporary Renewable Energy Development Charge, reset all components of the Total Renewable Energy Program Rate, reset the base Energy Efficiency Program Rates, reset the base Energy Efficiency Implementation Rates, reset the Energy Efficiency Program Amortization Rate, reset the Energy Efficiency Implementation Amortization Rates, and reset the Expanded Solar Program Costs. The Application contains 9 volumes. A detailed listing is provided in the Table of Contents.

Consistent with the Commission's electronic filing regulations as adopted in Docket No. 07-03015, following this cover letter please find a table of contents for the complete filing. A table of contents for each volume appears on the cover page which provides the page reference for each item in the volume.

Accompanying this transmittal letter are portions of the filing that are to be kept under seal pursuant to Nevada Revised Statutes section 703.190(2) and Nevada Administrative Code section 703.527 *et seq.* This information is contained in a sealed envelope appropriately marked, and contains the unredacted versions. The following is a description of the information the Company seeks to be kept confidential for a period of five years after which the material may be destroyed:

- Application Exhibit E-2.
- Appendix 1 – Minutes and presentations from Gas Hedging Workshops.
- Appendix 5 – Updated Capitalization Policy variable operations and maintenances ("O&M") costs as well as updated allocation ratios between Maintenance capital and O&M Expense as requested by the Commission in Docket No. 15-03001 (confidential operating and maintenance cost information). Provided in executable format.

- Appendix 6 – Risk Committee, January 18, 2023: Item 2 - Monthly Energy Supply Plan Update (customer specific information, fuel and gas price forecasts); Additional Item – 2022 Tuscarora Pipeline Rate Case (confidential settlement information); Risk Committee, January 31, 2023 – 2022 Tuscarora Pipe Line Rate Case Update (confidential settlement information).
- Appendix 6 – Risk Committee, February 15, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts).
- Appendix 6 – Risk Committee, March 13, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts); Item 3 – Infrastructure Protection (identification of critical infrastructure and infrastructure protection information).
- Appendix 6 – Risk Committee, April 19, 2023: Item 2- Monthly Energy Supply Plan Update (fuel and gas price forecasts).
- Appendix 6 – Risk Committee, May 17, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts).
- Appendix 6 – Risk committee, June 21, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts).
- Appendix 6 – Risk Committee, July 21, 2022: Item 2 - Monthly Energy Supply Plan Update; Item 3 - Risk Control Report (customer specific information and projected BTER and DEAA rates); GTN Pipeline settlement discussion (confidential settlement information).
- Appendix 6 – Risk Committee, August 16, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts); Item 3 - Risk Control Report (projected BTER and DEAA rates).
- Appendix 6 – Risk Committee, September 20, 2023; Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts); Item 3 - Risk Control Report (projected BTER and DEAA rates).
- Appendix 6 – Risk Committee, October 18, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts); Risk Control Report (projected BTER and DEAA rates).
- Appendix 6 – Risk Committee, November 15, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts); Risk Control Report (projected BTER and DEAA rates); Risk Committee Arrears Balance (customer specific information).
- Appendix 6 – Risk Committee, December 20, 2023: Item 2 - Monthly Energy Supply Plan Update (fuel and gas price forecasts); Item 4 - Risk Control Report (projected BTER and DEAA rates).

Exhibit E-2 includes confidential settlement information.

Technical Appendix 1 contains long term gas and fuel price forecasts. Disclosure of the confidential commercial information to any third party very well could adversely affect the Company's ability to optimize its resources on an ongoing basis. The Company regularly purchases and sells natural gas, fuels, wholesale power, financial instruments and renewable energy to meet the needs of its customers. Further, some of the information is considered confidential and proprietary information of a third party and is subject to a contractual nondisclosure agreement.

Technical Appendix 5 includes the operating and maintenance costs utilized for economic dispatching of Nevada Power's generating fleet. This information is commercially sensitive and/or trade secret information that derives independent economic value from not being generally known. This information is not known outside the Company and its distribution is limited within the Company. Releasing this highly sensitive information would disadvantage Nevada Power by limiting its ability to foster competition among prospective suppliers, compromising the Company's negotiating position and reducing its bargaining leverage. Publication of this information would unfairly advantage competing suppliers and impair Nevada Power's ability to achieve the most favorable pricing and terms and conditions from suppliers on behalf of its customers. Moreover, some of the information is considered confidential and proprietary information of a third party and is subject to a contractual nondisclosure agreement.

Technical Appendix 6 contains presentations made by employees to the Company's Risk Committee. At the time of each presentation, the Company considers the presentation confidential and proprietary because it contains sensitive commercial information. As time passes, the business information becomes less sensitive and, therefore is no longer confidential. However, certain portions of the presentation remain sensitive. The redacted material contains customer specific information, privileged and confidential commercial information, and confidential settlement information. Disclosure of the confidential commercial information to any third party very well could adversely affect the Company's ability to optimize its resources on an ongoing basis. The Company regularly purchases and sells natural gas, fuels, wholesale power, financial instruments and renewable energy to meet the needs of its customers.

The disclosure of information such as long-term fuel forecasts, the terms of transactions that the Company negotiated, but has not presented to the Commission, the Company's economic analysis of a negotiated transaction, the premiums the Company expects to receive, or might be willing to pay, could place the Company at a competitive disadvantage when procuring natural gas, fuel, transportation, wholesale power, renewable energy, or when the Company is attempting to sell such products. As such, the public disclosure of the Company's confidential commercial information very well could adversely affect the Company and its customers.

In addition, certain long-term forecasts rely on proprietary third-party information. Third parties claim that the Company's rights of use do not extend to publication. Similarly, some information contained in the Technical Appendices were obtained through discovery during contractual negotiations and are claimed to be confidential by the counter party. Accordingly, the Company treats the information as confidential at the request of third parties. Finally, contractual relationships with third-parties often contain confidentiality provisions. In certain situations, third-parties have asserted that these provisions require the Company to maintain information as confidential. Under these situations, the Company files the information under seal with the Commission.

Pursuant to the Commission's regulations, the public file contains redacted versions of this material.

Ms. Osborne  
March 1, 2024  
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Should you have any questions regarding this filing, please contact me at (775) 834-5793 or michael.knox@nvenergy.com.

Respectfully submitted,

/s/ Michael Knox  
Michael Knox  
Senior Attorney

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#### **Appendix 6 – Risk Committee**

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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** in Docket No. 24-03\_\_\_ upon all parties of record in this proceeding by electronic service to the following:

Don Lomoljo  
Public Utilities Comm. of Nevada  
1150 E. William Street  
Carson City, NV 89701-3109  
dlomoljo@puc.nv.gov

Staff Counsel Division  
Public Utilities Comm. of Nevada  
9075 West Diablo, Suite 250  
Las Vegas, NV 89148  
pucn.sc@puc.nv.gov

Attorney General's Office  
Bureau of Consumer Protection  
100 N. Carson St.  
Carson City, NV 89701  
bcpserv@ag.nv.gov

Attorney General's Office  
Bureau of Consumer Protection  
8945 W. Russell Road, Suite 204  
Las Vegas, NV 89148  
bcpserv@ag.nv.gov

DATED this 1<sup>st</sup> day of March, 2024.

/s/ Lynn D'Innocenti  
Lynn D'Innocenti  
Sr. Executive Assistant  
Nevada Power Company d/b/a NV Energy  
Sierra Pacific Power Company d/b/a NV Energy