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18-09003

Public Utilities Commission of Nevada  
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Filed For: LV Stadium Events Company LLC

In accordance with NRS Chapter 719,  
this filing has been electronically signed and filed  
by: /s CurtLedford

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This filing has been electronically filed and deemed to be signed by an authorized  
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representative of the signer(s) and  
LV Stadium Events Company LLC

**MCDONALD  CARANO**

**FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 5/24/2019**

**Curt R. Ledford**  
[cledford@mcdonaldcarano.com](mailto:cledford@mcdonaldcarano.com)

**Reply to: Las Vegas**

May 24, 2019

Breanne Potter  
Assistant Commission Secretary  
Public Utilities Commission of Nevada  
1150 East William Street  
Carson City, Nevada 89701

***Re: Docket No: 18-09003; LV Stadium Events Company, LLC's Motion to Suspend Compliance Schedule***

Dear Ms. Potter:

Please accept for filing in the above-referenced docket the Motion to Suspend Compliance Schedule filed on behalf of LV Stadium Events Company, LLC in this proceeding.

If you have any questions or concerns regarding the same, please contact me directly at 702-873-4100.

Sincerely,

MCDONALD CARANO LLP



Curt R. Ledford

CRL/lj  
Enclosures (as stated)

[mcdonaldcarano.com](http://mcdonaldcarano.com)

2300 West Sahara Avenue, Suite 1200 ■ Las Vegas, Nevada 89102 ■ 702.873.4100

100 West Liberty Street, Tenth Floor ■ Reno, Nevada 89501 ■ 775.788.2000

Mailing Address: P.O. Box 2670 ■ Reno, Nevada 89505

1 BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

2  
3 In the Matter of LV Stadium Events Company,  
4 LLC to purchase energy, capacity, and/or  
5 ancillary services from a provider of new  
6 electric resources

Docket No. 18-09003

7 **MOTION OF LV STADIUM EVENTS COMPANY, LLC**  
8 **TO SUSPEND COMPLIANCE SCHEDULE**

9 LV Stadium Events Company, LLC (the “Raiders”) hereby submits this Motion to Suspend  
10 Compliance Schedule to the Public Utilities Commission of Nevada (“Commission”) pursuant to  
11 NAC 703.550.

12 **I. BACKGROUND**

13 On February 1, 2019, the Commission issued a Final Order in this docket (the “Final  
14 Order”). In the Final Order, the Commission ordered that the Raiders must file certain  
15 compliances no later than 120 days after the date of the Final Order, which is June 1, 2019.<sup>1</sup>  
16 These compliances include identifying the Raiders’ points of delivery (no later than 120 days after  
17 the Final Order; Ordering Paragraph 5), submitting time of use meter information (no later than  
18 120 days after the Final Order; Ordering Paragraph 8), submitting a fully executed distribution-  
19 only service agreement (Ordering Paragraph 10), submitting a fully executed transmission service  
20 agreement (Ordering Paragraph 11), and submitting a copy of the agreement between the Raiders  
21 and the provider of new electric resources (Ordering Paragraph 12). Together, these compliance  
22 requirements are referred to herein as the “Compliances.” The Raiders have been preparing the  
23 materials necessary to file these Compliances in advance of the upcoming 120-day deadline.

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<sup>1</sup> June 1, 2019 is a Saturday, so pursuant to NAC 703.120(1), the compliance date falls on Monday June 3, 2019.

1                   **II. MOTION**

2                   i. Motion to Suspend the Compliances Contained in the Final Order.

3                   Recently, and following the Final Order, NV Energy approached the Raiders with a  
4 proposed new tariff that would be similar to how service is provided under NRS Chapter 704B,  
5 but the utility would be providing this service instead of a provider of new electric resources.

6                   Pursuant to NRS 704.110, any new tariff proposed by a regulated utility needs to be  
7 approved by the Commission before service can be offered under such tariff, and new tariff  
8 dockets take time to complete.<sup>2</sup> To allow the Raiders to fully evaluate this proposed new tariff,  
9 the Raiders respectfully request that the Commission suspend the Compliances to allow time for  
10 the Commission, and the Raiders, to evaluate the new tariff to be filed by NV Energy. The  
11 suspension should exist for only as long as necessary for the Commission to make a ruling in the  
12 new tariff filing. If a tariff is not filed within 30 days of this Motion, or if the Raiders decide to  
13 not accept the new proposed tariff, the Compliance schedule should subsequently resume.

14                  Since the Raiders’ Las Vegas Stadium (the “Stadium”) is currently under construction and  
15 does not need fully-operational service until mid-2020, it can continue to take construction power  
16 until the Stadium project is complete and fully-operational. As such, there is no prejudice to NV  
17 Energy or the remaining customers of the utility to allow the Raiders to consider the proposed  
18 new tariff being developed by NV Energy. Instead, if the Commission considers the new tariff to  
19 be in the public interest, there may be a benefit to NV Energy and its remaining customers from  
20 the Raiders staying in the NV Energy system under such tariff.

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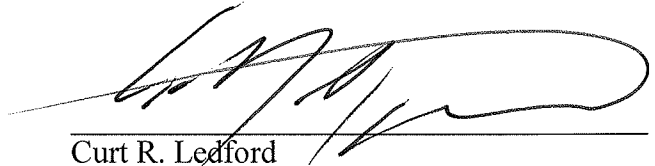
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28                  <sup>2</sup> NRS 704.110.

1                   ii. Motion for Order Shortening Time; Request for Special Agenda.

2                   The Raiders request that the Presiding Officer rule on this motion immediately, or, in the  
3 alternative, shorten time for filing responses to two (2) business days and provide one (1) day to  
4 reply. If the Presiding Officer refers this Motion to the full Commission, due to the timing of the  
5 Compliance deadlines, the Raiders request that the Commission set a special agenda on or before  
6 June 3, 2019.

7                   Respectfully submitted this 24<sup>th</sup> day of May, 2019.

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9  
10 Curt R. Ledford  
11 McDonald Carano, LLP  
12 2300 W. Sahara Ave, 12<sup>th</sup> Floor  
13 Las Vegas, NV 89102  
14 Tel: 702-873-4100  
15 Email: [cledford@mcdonaldcarano.com](mailto:cledford@mcdonaldcarano.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of May, 2019, I caused to be served by either electronic mail or U.S. Mail, a true and correct copy of the foregoing document on each of the persons identified on the following list:

Sam Crano, Staff Counsel  
Public Utilities Commission of Nevada  
9075 W Diablo Dr., Ste 250  
Las Vegas NV 89148  
scrano@puc.nv.gov  
pucn.sc@puc.nv.gov

Timothy Clausen  
NV Energy  
P.O. Box 10100  
Reno, NV 89520  
tclausen@nvenergy.com  
regulatory@nvenergy.com

Michael Saunders  
Bureau of Consumer Protection  
Office of the Attorney General  
100 N. Carson Street,  
Carson City, NV 89701  
msaunders@ag.nv.gov  
bcpserve@ag.nv.gov



An employee of McDonald Carano LLP

**McDONALD CARANO**

100 WEST LIBERTY STREET, TENTH FLOOR • RENO, NEVADA 89501  
PHONE 775.788.2000 • FAX 775.788.2020

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