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April 15, 2022

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

Re: **Nevada Power Company, d/b/a NV Energy, and Sierra Pacific Power Company, d/b/a NV Energy; Portfolio Standard Annual Report for Compliance Year 2021**

Dear Ms. Osborne:

Enclosed for filing are Nevada Power Company's ("Nevada Power") and Sierra Pacific Power Company's ("Sierra") (collectively, the "Companies") aforementioned filing.

The documents accompanying this report are:

1. Draft Public Notice of the filing;
2. Portfolio Standard Annual Report for Compliance Year 2021, which has an eight-part Appendix that includes the required Attestation Letters in Appendix Section 5.3

This filing complies with the requirements of NAC 704.8877 and NAC 704.8879, which requires providers of electric service to submit to the Commission an annual report regarding compliance with the portfolio standard for the previous compliance year. In particular, NAC 704.8877 and NAC 704.8879 require that the following information be set forth:

NAC 704.8879(2)(a).

The capacity of each renewable energy system owned, operated or controlled by the provider, the total number of kilowatt-hours generated by each such system during the most recently completed compliance year and the percentage of that total amount which was generated directly from renewable energy.

Tables 3-4 (Nevada Power) and 4-6 (Sierra) details the capacity of each of the Companies' renewable energy systems for 2021. These tables are found at Sections 3.7 and 4.8 respectively.

NAC 704.8879(2)(b).

Whether the provider began construction on, acquired or placed into operation any renewable energy system.

New Company owned renewable systems are discussed in Sections 3.8 (Nevada Power) and 4.9. (Sierra) of the report.

NAC 704.8877(1)(a) and NAC 704.8879(2)(c).

The total number of kilowatt-hours sold by the provider to its retail customers in this State during the most recently completed compliance year.

Actual retail sales for each company for the calendar year 2021 are reported in Section 3.9 (Nevada Power) and 4.10 (Sierra).

NAC 704.8879(2)(d).

The total number of kilowatt-hours that the provider generated or acquired from renewable energy systems during the most recently completed compliance year and, for that total number of kilowatt-hours, subtotals for the number of kilowatt-hours: (1) Generated by the provider from its own renewable energy systems; (2) Acquired by the provider pursuant to preexisting renewable energy contracts; (3) Acquired by the provider pursuant to new renewable energy contracts; (4) Attributable to the provider from solar thermal systems; (5) Fed back to the provider from net metering systems used by customer-generators and (6) Carried forward by the provider from previous compliance years.”

Tables 3-5 (Nevada Power) and 4-7 (Sierra) provide the required information. Table 3-5 is found in Section 3.10 and Table 4-7 is found in Section 4.11.

NAC 704.8879(2)(e).

The total number of kilowatt-hours that the provider: (1). Sold as a result of customer participation in a voluntary option to purchase all or a portion of the customer’s energy from renewable resources; and (2) Sold pursuant to paragraphs (b) and (c) of subsection 2 of NRS 704.7828.

Table 3-6 (Nevada Power) and Table 4-8 (Sierra) provide the required information. Table 3-6 is found in Section 3.11 and Table 4-8 is found in Section 4.12.

NAC 704.8879(2)(f).

The total number of kilowatt-hours that the provider intends to carry forward from the most recently completed compliance year.

Tables 3-7 (Nevada Power) and 4-9 (Sierra) provide the required information. Table 3-7 is found in Section 3.12 and Table 4-9 is found in Section 4.13.

NAC 704.8877(1)(b)-(c) and NAC 704.8879(2)(f)-(g).

The estimated amount of retail sales the provider expects to sell to its retail customers during the current compliance year and the estimated number of kilowatt-hours that the provider must generate or acquire from renewable energy systems to comply with its portfolio standard for the current compliance year.

Estimated 2022 retail sales in kilowatt-hours are reported in Section 3.13 (Nevada Power) and 4.14 (Sierra). The number of PCs each Company will be required to generate or acquire in 2022 is shown in Table 3-8 (Nevada Power) and Table 4-10 (Sierra). Table 3-8 is located in Section 3.14 and Table 4-10 is located in Section 4.15.

NAC 704.8879(2)(h).

The estimated costs for the utility provider to comply with its portfolio standard for the current compliance year 2021. If appropriate, the utility provider must report such estimated costs for each major type of cost, such as general and administrative costs and costs for purchased power.

Tables 3-9 (Nevada Power) and 4-11 (Sierra) detail the required information. Table 3-9 is located in Section 3.15 and Table 4-11 is located in Section 4.16.

NAC 704.8879(3)(a)-(b).

The provider must make an affirmative showing that the provider complied with its portfolio standard and if not in compliance, the annual report must:

- a) Make a detailed explanation for its noncompliance; and**
- b) Provide any information that would support an exemption for the provider from any administrative fine or other administrative action.”**

The affirmation of compliance for Nevada Power is found at Section 3.16 and is depicted in Table 3-10 in the Section. The affirmation of compliance for Sierra is found in Section 4.17 and is depicted in Table 4-12 in that Section.

NAC 704.8879(4)(a)-(b)

If the provider acquired any kilowatt hours from a renewable energy system that is not owned, operated or controlled by the provider, the annual report must include an attestation from the owner or operator of the renewable energy system that the energy represented by those kilowatt-hours

- (a) Has not been and will not be sold or otherwise exchanged for compensation or used for credit in any other state or jurisdiction; and**
- (b) Has not been and will not be included within a blended energy product certified to include a fixed percentage of renewable energy in any other state of jurisdiction.**

The signed attestation letters are located in Appendix Section 5.3.

Trisha Osborne Assistant Commission Secretary
Public Utilities Commission of Nevada
April 15, 2022
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Pursuant to NAC § 703.5274(1), one unredacted copy of the confidential information will be printed and 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. A disc containing the confidential workpaper is also attached.

The Companies request that designated information remain confidential for a period of at least 5 years, after which it may be destroyed or returned to the Companies, whichever is more convenient for the Commission. 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.

If you have any questions or concerns pertaining this filing, please do not hesitate to contact me directly.

Sincerely,

/s/ Michael Knox

Michael Knox
Senior Attorney
Nevada Power Company, d/b/a NV Energy
Sierra Pacific Power Company, d/b/a NV Energy
775-834-5793
Michael.Knox@nvenergy.com

DRAFT NOTICE

PUBLIC NOTICE

(Pursuant to NAC 703.162 and NAC 703.5274)

I. Pursuant to NAC 703.160(5)(a), the title of the filing is:

Filing by NEVADA POWER COMPANY, d/b/a NV ENERGY, and SIERRA PACIFIC POWER COMPANY, d/b/a NV ENERGY, for acceptance of their Portfolio Standard Annual Report for Compliance Year 2021.

II. Pursuant to NAC 703.160(5)(b), the name of the applicants are:

NEVADA POWER COMPANY, d/b/a NV ENERGY, and SIERRA PACIFIC POWER COMPANY, d/b/a NV ENERGY.

III. Pursuant to NAC 703.160(5)(c), a brief description of the purpose of the filing is:

This is NEVADA POWER'S and SIERRA PACIFIC'S 2021 Annual Report of the Portfolio Standard for renewable energy filed pursuant to Nevada Revised Statutes ("NRS") Sections 704.7821 to 704.7828, and Nevada Administrative Code ("NAC"), Sections 704.8831 to 8893, including but not limited to NRS 704.7825 and NAC 704.8879. The Portfolio Standard Annual Report provides information to the Commission regarding the actions undertaken by the Companies to comply with the Portfolio Standard for Renewable Energy for Compliance Year 2021.

The Nevada Legislature enacted into law a Renewable Energy Portfolio Standard ("RPS") which mandates that providers of electrical service are required to generate, acquire or save electricity from portfolio energy systems or efficiency measures a number of portfolio energy credits ("PECs") that is equal to or greater than a percentage of their retail sales as defined in NRS 704.7821(1). For the calendar year 2021, that percentage is set at 24% percent of electricity sold to

their Nevada retail customers. Additionally, not more than 10 percent of that total came come from energy efficiency measures. Of the energy efficiency measures, at least 50 percent of that amount must have come from energy efficiency measures installed at service locations of residential customers unless a different percentage is approved by the Commission.

If the Commission determines that for Compliance Year 2021 there was not or will not be a sufficient supply of portfolio energy credits available to the provider pursuant to contract with just and reasonable terms and conditions, the Commission shall exempt the Companies from the remaining requirements as allowable under NRS 704.7821(6).

AND Pursuant to NAC 703.160(5)(c), the effect of the relief upon consumers:

The Portfolio Standard Annual Report is filed pursuant to regulation and does not seek “relief” as that term is used in NAC 703.160(5).

- IV. Pursuant to NAC 703.162(2), a consumer session is not required by NRS 704.069.
- V. This draft notice does not pertain to a tariff filing.

REPORT

NV Energy

Nevada Power Company *d/b/a* NV Energy

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

Portfolio Standard Annual Report

Compliance Year 2021

Docket No. 22-040xx

April 15, 2022

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

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NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

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Glossary of Terms and Abbreviations

2021 Annual Report	Portfolio Standard Annual Report Compliance Year 2021
AB	Assembly Bill
AC	Alternate Current
Commission	Public Utilities Commission of Nevada
COD	Commercial Operating Date
DSM	Demand-Side Management (energy efficiency savings)
DOS	Distribution Only Service
ESP	Energy Supply Plan
kPC	One thousand Portfolio Energy Credits
kW	Kilowatt of AC nameplate capacity, unless noted otherwise
kWh	Kilowatt-hours
MW	Megawatt of AC nameplate capacity, unless noted otherwise
MWh	Megawatt-hours (or one thousand kilowatt-hours)
NAC	Nevada Administrative Code
NGR	NV GreenEnergy Rider
Nevada Power	Nevada Power Company d/b/a NV Energy
NRS	Nevada Revised Statutes
NVE	NV Energy, Inc.
NVTREC	Nevada Tracks Renewable Energy Credits
PC	Portfolio Energy Credit, one kilowatt-hour of renewable energy generated or one kilowatt-hour of energy saved through an efficiency program
PPA	Power Purchase Agreement
PUCN	Public Utilities Commission of Nevada
R-BTER	Renewable Base Tariff Energy Rate
REC	Renewable Energy Credit (1 REC = 1 kPC) Alternative term for a kPC
RFP	Request for Proposal
RPS	Renewable Portfolio Standard
SB	Senate Bill
Sierra	Sierra Pacific Power Company d/b/a NV Energy
WREGIS	Western Renewable Energy Generation Information System

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

1. Introduction

Nevada Power Company d/b/a NV Energy (“Nevada Power”) and Sierra Pacific Power Company d/b/a NV Energy (“Sierra”) are both wholly-owned subsidiaries of NV Energy, Inc., a wholly-owned subsidiary of Berkshire Hathaway Energy Company. Nevada Power and Sierra, collectively referred to in this report at times as the “Utilities” or “NV Energy” serve a combined service territory of approximately 45,592 square miles, all in the state of Nevada, and together they serve over 1.36 million electric customers. Nevada Power and Sierra serve approximately 994,000 electric customers in southern Nevada, primarily in the Las Vegas area, and 369,000 electric customers in northern Nevada, as well as 179,000 natural gas customers in the Reno-Sparks area of northern Nevada.

This Portfolio Standard Annual Report for Compliance Year 2021 (“2021 Annual Report”) is submitted by Nevada Power and Sierra to the Public Utilities Commission of Nevada (“Commission”) pursuant to section 704.7801 et seq. of the Nevada Revised Statutes (“NRS”) and the corresponding provisions of the Nevada Administrative Code (“NAC”) to document their respective compliance with Nevada’s Renewable Portfolio Standard (“RPS”).

Nevada’s history with respect to renewable energy policy dates back to utility restructuring legislation in 1997. It was then that the Nevada Legislature enacted the initial RPS requirement, which mandates that a specific minimum portion of the energy delivered to Nevada retail customers be met by renewable energy resources. Since that time, Nevada has made several revisions to the RPS. The last significant changes were enacted in 2019 under Senate Bill 358 (“SB 358”). Among the most notable changes, SB358 increased the RPS percentage levels, expanded resource eligibility, changed the credit requirement calculation and eliminated the minimum solar credit requirement.

The RPS increased to 24 percent for the calendar year 2021. It will increase to 29 percent for the calendar years 2022 through 2023, 34 percent for calendar years 2024 through 2026, 42 percent for calendar years 2027 through 2029, and 50 percent for calendar year 2030 and thereafter. In complying with this requirement, for 2021, no more than 10 percent of the overall credits can come from energy efficiency measures, and of those credits, at least 50 percent must come from energy efficiency measures installed at service locations of residential customers. The 10 percent cap will drop to zero starting in compliance year 2025. Energy saved by customers through energy efficiency and conservation measures is referred to as Demand-Side Management (“DSM”).

The Nevada RPS is stated in terms of the number of Portfolio Credits (“PC”) required for compliance. A PC is equal to one kWh of renewable energy generated or one kWh of energy saved through an efficiency program.

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

2. Executive Summary

Both Nevada Power and Sierra successfully met the 2021 RPS requirement. For Nevada Power, the 2021 RPS required the utility to supply 4,970,977 kPCs. Nevada Power exceeded the requirement by accumulating 6,244,659 eligible kPCs in total.

For Sierra, the 2021 RPS required the utility to supply 2,094,780 kPCs. Sierra exceeded this requirement, accumulating 2,779,966 eligible kPCs in total.

Table 2-1 below summarizes the calculation of the 2021 RPS credit requirement, the total number of eligible credits by credit type, the overall RPS percentage, for each utility and for NV Energy in total.¹

Table 2-1 Nevada Power, Sierra, & NV Energy 2021 Compliance Summary

	Nevada Power	Sierra	NV Energy
Retail Sales (MWh)	20,712,404	8,728,248	29,440,652
RPS Requirement	<u>24%</u>	<u>24%</u>	<u>24%</u>
Credit Requirement	4,970,977	2,094,780	7,065,757
 Eligible 2021 Credits (kPCs)			
Non-DSM	5,747,562	2,570,488	8,318,050
DSM (Capped at 10%)	<u>497,098</u>	<u>209,478</u>	<u>706,575</u>
Total	6,244,659	2,779,966	9,024,625
 Overall RPS %	 30.1%	 31.9%	 30.7%

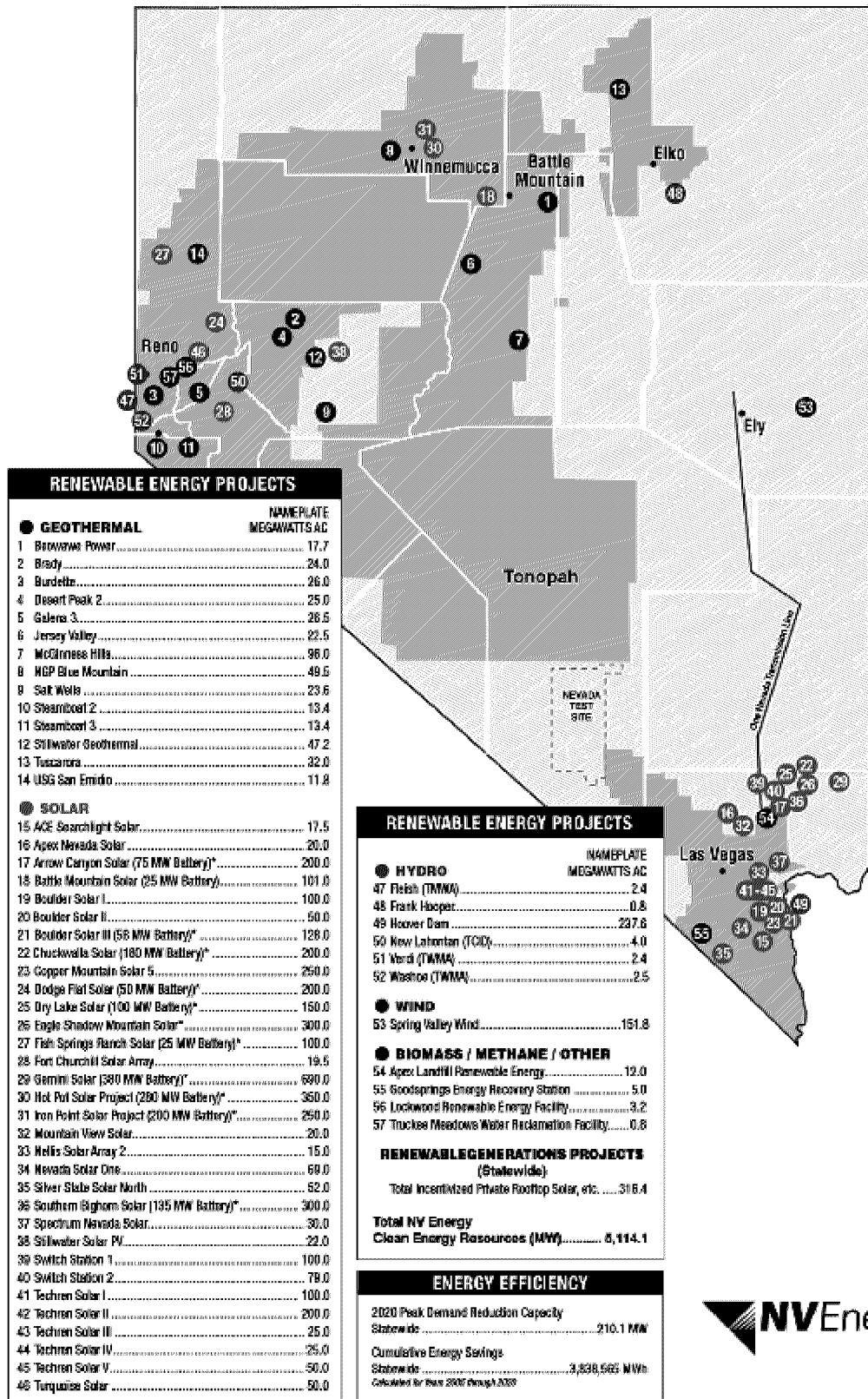
The 2021 Annual Report is divided into two parts, one for each utility, and each part is further divided into sections. There are 19 sections for Nevada Power and 20 sections for Sierra. The sections provide a comprehensive update for each of the key areas, activities and/or metrics that determine the overall results that each utility achieved in 2021 in meeting its statutory and other renewable energy credit commitments. This filing complies with the requirements of NAC §§ 704.877 and 704.998 which require that certain information be set forth.

A map of all facilities operating, in construction, or in development for Nevada Power and Sierra is set forth in the following page in Figure 1 and shows the individual projects by name, type, nameplate megawatt rating and corresponding map location.

¹ Total NV Energy is shown for illustration. The RPS requirements apply to each utility individually.

FIGURE 1. RENEWABLE ENERGY GENERATOR MAP

NV Energy's Clean Energy Commitment

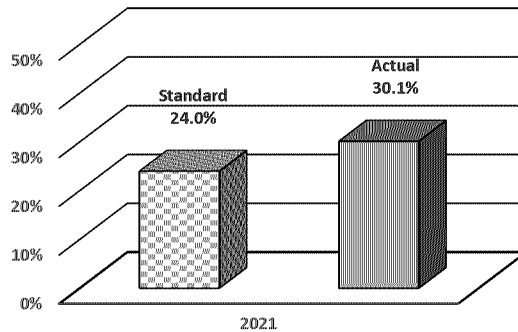


3. Nevada Power Annual Report Requirements

3.1 2021 Nevada Power Overview

Nevada Power exceeded the 2021 RPS credit requirement of 24 percent of retail sales from RPS-eligible resources, achieving 30.1 percent. The RPS percentage shown below in Figure 2 is based on an overall credit requirement of 4,970,977 kPCs and total eligible credits of 6,244,659 kPCs. Ignoring DSM credits in excess of the 10 percent DSM limit, Nevada Power ended 2020 with a net surplus of 1,273,682 kPCs.

FIGURE 2. 2021 NEVADA POWER RPS STANDARD VS ACTUAL PERCENTAGE



Nevada Power ended 2021 with approximately 1,570 MW of operating renewable generation capacity.² Like Sierra, all of Nevada Power’s operating projects are located in Nevada, and all are currently delivering renewable energy to meet the needs of Nevada Power’s customers. In 2021, Nevada Power added one new utility scale project, Copper Mountain 5. Copper Mountain 5 is a 250 MW photovoltaic facility located in Boulder City, Nevada. The facility declared commercial operation on July 23, 2021. It was approved by the Commission in Docket No. 18-06003.

In addition to 1,570 MW of renewable capacity currently in operation, Nevada Power ended 2021 with nine photovoltaic projects totaling 2,044 MW in various stages of development and construction. Eight of these projects include co-located battery storage. Battery storage offers flexibility giving Nevada Power the ability to store generation when demand and prices are low and releasing it back to the grid when demand and prices start to rise. This helps to optimize must-take renewable resources, like solar photovoltaic and wind, where generation and load do not always align.

Table 3-1 below is a list of the Nevada Power pipeline projects showing the facility name, resource type, approval docket number, projected commercial operation date, nameplate capacity, storage capacity, and energy and capacity allocation as approved by the Commission in the order.

² The 1,570 MW is calculated based on dividing the Nevada Solar One 69-MW agreement between Nevada Power (46.9 MW) and Sierra (22.1 MW), as previously approved by the Commission. It also includes the two PEC only agreements, Nellis 1, 13.2 MW and Las Vegas Water District, 3 MW, and Nevada Power’s allocation of Hoover, 237.6 MW.

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Table 3-1 Nevada Power Pipeline Generation as of December 31, 2021

Facility	Resource Type	Approval Docket No.	Projected COD	Nameplate MW AC	Storage Capacity	Energy / Capacity Allocation		
						NPC	SPPC	
Moapa (Arrow Canyon) Solar ^a	Solar PV	19-06039	12/01/22	200	75	60	140	
Eagle Shadow Mountain	Solar PV	18-06003	03/01/23	300		300		
Southern Bighorn Solar Farm ^a	Solar PV	19-06039	09/01/23	300	135	180	120	
Chuckwalla	Solar PV	20-07023	12/01/23	200	180	200		
Boulder Solar III	Solar PV	20-07023	12/31/23	128	58	128		
Iron Point ^b	Solar PV	21-06001	12/01/23	250	200	140	110	
Dry Lake Solar	Solar PV	20-07023	12/31/23	150	100	150		
Hot Pot ^b	Solar PV	21-06001	12/01/24	350	350	196	154	
Gemini Solar ^c	Solar PV	19-06039	05/01/24	690	380	690		
					2,568	1,478	2,044	524.0

Notes to Table 3-1

- a. The energy/capacity of the project as allocated between Nevada Power and Sierra per the order (Docket No. 19-06039)
- b. The energy/capacity of the project as allocated between Nevada Power and Sierra per the order (Docket No. 21-06001)
- c. 40 percent of the PCs derived from Gemini Solar are to be assigned to Sierra per the order (Docket No. 19-06039)

In addition to its growing portfolio of company owned and long-term contract renewable generating resources, Nevada Power entered into a short-term purchase agreement with Tonopah Solar Energy. The short-term agreement covers the purchase of energy and energy credits from Tonopah’s Crescent Dunes solar thermal facility. The Company previously had entered into a Commission-approved long-term energy purchase agreement for the energy and energy credits from this plant. That agreement, however, was terminated in October 2019 after the plant suffered several years of chronic mechanical issues which impacted its ability to meet its energy supply commitments. The plant ended up being shut down in April 2019 to undergo a series of extensive repairs. The facility has since changed ownership, and the new owners claim to have addressed the underlying reliability issues. The plant resumed operations in July 2021. In addition to negotiating favorable pricing, the short-term agreement provides Nevada Power with an additional green resource to assist in meeting customer demand during peak summer months. It also provides Nevada Power a cushion until the 2,044 MW of new generation in the pipeline can achieve commercial operation. The short-term purchase agreement runs through September 30, 2024.

3.2 2021 NV GreenEnergy Rider Tariff

Nevada Power had previously entered into two NV GreenEnergy Rider (“NGR”) agreements with Switch Ltd. (“Switch”). The first, Switch Station 1, also known as Playa Solar 2, is a 100 MW photovoltaic project located in Clark County, Nevada, northeast of Las Vegas. The project was approved by the Commission in Docket No. 15-07003 as one of the Emissions Reduction and Capacity Replacement (“ERCR”) renewable projects. Subsequently, Nevada Power entered into an NGR agreement with Switch, under which the renewable energy attributes from the project were assigned to Switch. This agreement was approved by the Commission in Docket No. 15-08005. Nevada Power also entered into a second NGR agreement with Switch for 35 percent of the output from a 79 MW photovoltaic project, Switch Station 2, also known as Playa Solar 1, located in Clark County, Nevada. The agreement was approved by the Commission in Docket No.

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

15-11028. The Switch Station 2 NGR agreement was modified per a January 17, 2018, notice from Switch and starting April 17, 2018, 100 percent of the energy and credits were assigned to Sierra and Sierra's companion NGR agreement with Switch.

In 2016, Switch received Commission approval to purchase its energy, capacity and/or ancillary services from a provider of new electric services for its operations in both Utilities' service territories. Switch's 704B application was approved in Docket No. 16-09023. Switch began purchasing its energy from an alternative supplier beginning June 1, 2017. Although Switch is no longer a bundled customer for most of their loads, Switch will continue to purchase the PCs from Switch Station 1 for the duration of the agreement.

Nevada Power entered into an agreement to sell credits to Sierra as part of an NGR approved by the Commission between Sierra and Truckee Meadows Community College ("TMCC"). Under the three-year agreement, Nevada Power is to sell 7,200 kPCs to Sierra annually. The agreement commenced on December 1, 2019. The credits are to be sourced from Techren Solar 1. Sierra will sell the credits to TMCC under an NGR agreement. The NGR between Sierra and TMCC, and a companion sales agreement between Sierra and Nevada Power to provide the PCs were approved by the Commission in Docket No. 19-05006.

The PCs from the above NGR agreements and the Nevada Power/Sierra credit sales agreement are reported below in Section 3.10, Credit Sales.

Finally, the Company launched a new NGR program or open season in 2022. This program, which was approved by the Commission in Docket No. 21-09018 is open to both residential and non-residential customers of Nevada Power. The program is designed to help customers achieve their sustainability goals and to help drive clean energy development in Nevada. Nevada Power is initially targeting 3 MW of renewable resource capacity for residential and 50 MW for non-residential customers.³ The Company conducted an open season in February where interested customers could enroll in the new NGR tariff. The tariff rates will become applicable starting on July 1, 2022. Please refer to Docket No. 22-04007 for details on the new tariff and for the results of the first open enrollment season.

3.3 2021 Energy Supply Agreements.

Nevada Power entered into an Energy Supply Agreement ("ESA") with the Lumen Group, LLC. During the term of the ESA, Nevada Power will transfer PCs to the customer in an amount equal to the customer's load-ratio share of the total PCs associated with the Renewable Base Tariff Energy Rate ("R-BTER") and the Temporary Renewable Energy Development ("TRED"). The PCs are to be transferred annually. In 2021, Nevada Power's credit obligation under the terms of the ESA totaled 8,767 kPCs, and Nevada Power's 2021 retail sales will be reduced by 8,767 MWh, an amount equal to the number of PCs to be transferred to Lumen. The ESA and the associated PC Purchase Agreement were approved by the Commission in Docket No. 19-12017.

³ The number of credits set aside is based on the average capacity factor for solar (30 percent). For 2022, Nevada Power is estimating the numbers of credits needed to cover the program at 69,942 kPCs (53*8,760*.3*.5). This total assumes that all 53 MW initially set aside are subscribed. The total is also cut in half for 2022 as it would only be in effect for half of the year.

3.4 2021 704B Agreements

In 2020, Las Vegas Resorts Holdings, LLC (The Sahara Las Vegas”), received Commission approval to purchase their energy, capacity and/or ancillary services from a provider of new electrical resources. The Sahara Las Vegas’ request was approved by the Commission in Docket No. 18-12019. The Sahara Las Vegas exited Nevada Power on January 1, 2020.

In 2019, Georgia-Pacific Gypsum, LLC (“Georgia-Pacific”), received Commission approval to purchase their energy, capacity and ancillary services from a provider of new electrical resources. Georgia-Pacific’s request was approved by the Commission in Docket No. 18-09015. Georgia-Pacific exited Nevada Power on February 1, 2020.

In 2017, Caesars Enterprise Services, LLC (“Caesars”), received Commission approval to purchase their energy, capacity and/or ancillary services from a provider of new electrical resources. Caesars’s request was approved by the Commission in Docket No. 16-11034. Caesars exited Nevada Power on February 1, 2018.

In 2016, MGM Resorts International (“MGM”) and Wynn Las Vegas (“Wynn”) received Commission approval to purchase their energy, capacity and/or ancillary services from a provider of new electrical resources. MGM’s request was approved by the Commission in Docket No. 15-05017; Wynn’s request was approved in Docket No. 15-05006. Both MGM and Wynn subsequently began purchasing from an alternative energy provider effective October 1, 2016. MGM sold Circus Circus Las Vegas on January 1, 2020. The property, although no longer owned by MGM, is subject to the same exit terms as MGM.

Under the terms of the exit orders, the above entities are subject to a special tariff, R-BTER, for specified period of time to offset a portion of the cost of certain long-term renewable power purchase agreements that Nevada Power entered into when Nevada Power was their energy supplier. Payment of the tariff entitles the six distribution only service (“DOS”) customers to receive a portion of the PCs associated with the agreements included in the tariff.⁴ Nevada Power’s credit obligation is calculated based on their retail sales as a percentage of Nevada Power’s overall retail sales adjusted to include DOS for the above entities subject to the R-BTER tariff. The resulting percentage is then used to calculate the number of PCs from the underlying power purchase agreements to be transferred. The allocation is adjusted to account for Nevada Power’s outstanding credit repayment obligation to Sierra. MGM, Circus Circus Las Vegas, and Wynn’s R-BTER obligation, and the associated credit allocation terminate on December 31, 2022. Caesars’s R-BTER terminates on December 31, 2023. The Sahara Las Vegas terminates on December 31, 2025. Georgia-Pacific terminates on January 31, 2026. In addition, all six companies are entitled to a portion of the credits from RenewableGenerations incentivized systems (“RENGEN” credits). The Sahara Las Vegas and Georgia-Pacific are also entitled to receive a portion of the credits from the temporary renewable energy development tariff (“TRED”). The annual credit obligation for both the Renewable Energy Program Rate (“REPR”) and TRED are based on a similar calculation as the R-BTER.⁵

⁴ Caesars Enterprise Services, The Circus Circus Las Vegas, Georgia-Pacific Gypsum, MGM Resorts International, The Sahara Las Vegas, and The Wynn.

⁵ Circus Circus Las Vegas, MGM & Wynn the REPR terminates on 09/30/2022. Caesars, The Sahara Las Vegas, and Georgia-Pacific the REPR terminates when the R-BTER terminates.

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The table below shows Nevada Power’s credit obligation for 2021 and projected 2022-2025 credit obligation per the terms of the five 704B Commission decisions with multi-year credit obligations. The table below only covers actual and projected credit obligations to 704B customers that exited Nevada Power’s bundled service prior to January 1, 2021.

Table 3-2 2021 Actual & 2022–2025 Projected 704B Credit Obligations

	Actual	Projected >			
	2021	2022	2023	2024	2025
	kPCs	kPCs	kPCs	kPCs	kPCs
MGM					
R-BTER	89,067	100,128	Obligation Terminates in 2022		
REPR	21,998	18,307			
Total	111,065	118,435	0	0	0
Circus Circus					
R-BTER	6,123	6,883	Obligation Terminates in 2022		
REPR	1,512	1,259			
Total	7,635	8,142	0	0	0
Wynn					
R-BTER	19,518	21,942	Obligation Terminates in 2022		
REPR	4,821	4,012			
Total	24,339	25,954	0	0	0
Caesars					
R-BTER	54,918	70,456	72,124	Obligation	
REPR	14,199	14,399	14,695	Terminates in 2023	
Total	69,117	84,855	86,819	0	0
The Sahara Las Vegas					
R-BTER/TRED	3,350	3,206	4,210	4,233	4,217
REPR	789	800	816	818	811
Total	4,139	4,006	5,026	5,051	5,028
Georgia Pacific					
R-BTER/TRED	3,039	2,913	3,640	3,717	3,704
REPR	693	702	717	718	712
Total	3,732	3,615	4,357	4,435	4,416

Notes to Table 3-2:

The above 2022-2025 credit obligation (kPC) totals are estimates. The exact numbers of credits to be transferred for each period will be determined based on MGM’s, Caesar’s, Circus Circus Las Vegas’, Georgia-Pacific’s, The Sahara Las Vegas’ and Wynn’s actual distribution load; Nevada Power’s actual bundled retail sales; and the actual number of credits generated by the renewable resources included in the R-BTER, REPR and TRED.

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Finally, Nevada Power made a final payment of 537,438 geothermal kPCs to Sierra. These credits are available for Sierra to use in meeting its 2021 RPS credit requirement or can be banked by Sierra for future use. With the final payment made, all credits that were borrowed from the joint pool by Nevada Power have been fully repaid. Please reference Section 3.17 below for additional information on the status of the joint credit pool.

3.5 2022 Compliance Outlook

Nevada Power's compliance outlook is positive. The Company has been successful in building a pipeline of new projects to meet its future credit and renewable energy needs. As stated in the previous filings, no outlook is without risk. The biggest risks today are delays and cancellations. For example, Eagle Shadow Mountain a 300-megawatt solar facility was originally scheduled to declare commercial operation on January 1, 2022, but that date as now been pushed back to March 1, 2023. Although the plant is delivering test energy, it is not the full amount of energy that the company was counting on. The developer is experiencing delays in procuring the components needed to complete the facility. All of Nevada Power's pipeline projects are solar, and the difficulty of procuring panels, racking, cabling, transformers, and other critical hardware is not unique to Eagle Shadow Mountain. Supply chain disruptions are now part of doing business in a post COVID world, and it is possible that other projects may experience similar delays.⁶ Fortunately, Nevada Power has a robust pipeline of projects in various stages of development to offset energy/credit losses stemming from short-term Commercial Operation Date ("COD") delays. However, that cushion is not unlimited. The worst-case scenario remains that one or more of the pipeline projects is cancelled. Delays and shortages can drive up costs to a point where a project that was previously economical becomes uneconomical. Unlike delayed projects where a project might be able to deliver test energy during a protracted construction/commissioning process, canceled projects deliver nothing and can take four or more years, from start of procurement efforts to COD, to replace.

In summary, while Nevada Power is currently positioned to meet its future credit commitments (RPS, NGR, ESP and 704B obligations), experience has shown that renewable projects, both operating and pipeline, are unpredictable. Nevada Power will continue explore all options, including continuing to issue renewable energy RFPs and exploring short-term purchase agreements that benefit customers, so that it can procure the renewable generating resources needed to continue its commitment to becoming carbon-free. To this end, RPS is the floor.

3.6 2021 Surplus Credit Calculation

Table 3-2 below shows the calculation of the surplus credits required under NRS § 704.7828. Excluding DSM credits, which are subject to limitations and are likely to have no value other than to Sierra, Nevada Power ended 2021 with 689,826 kPC in excess of optional 10 percentage marketing requirement and no credits in excess of the mandatory 25 percent marketing requirement. A decision whether to market the 689,826 kPCs in excess of 10 percentage threshold will be made in the current calendar year if the circumstances are favorable, and the sale benefits our customers.

⁶ Delays are an evolving challenge and both utilities will continue to adjust their outlooks and take corrective action as new information and alternatives become available.

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Table 3-3 Nevada Power 2021 Surplus Carry Forward Test (in kPCs)

Surplus 2021 Non-DSM Credits		1,273,682	
Surplus 2021 DSM Credits		<u>5,214,620</u>	
Total Surplus Credits		6,488,301	
Less DSM Credits		<u>5,214,620</u>	
Surplus Unrestricted Credits		1,273,682	
Projected 2022 Credit Requirement		5,838,559	
	10%	583,856	
	25%	1,459,640	
Credits in Excess of Thresholds		689,826	
	25%	0	

The following pages contain the reporting information required by NAC § 704.8879 for annual reporting by providers of electric service.⁷ For convenience, Nevada Power has listed the specific requirements of the Annual Report as set forth in NAC § 704.8879(2).

3.7 2021 Capacity

NAC § 704.8879(2)(a). The capacity of each renewable energy system owned, operated, or controlled by the provider, the total number of kilowatt-hours generated by each such system during the most recently completed compliance year, and the percentage of that total amount which was generated directly from renewable energy.

Table 3-4 Nevada Power 2021 Owned Renewable Energy Capacity

	Capacity (kW)	2020 Generation (kWh)	2020 Credits (PCs)	% From Renewable Energy
Pearson PV	12	0	0	100%
Pearson EV Charging	19	34,103	34,103	100%
Goodsprings ¹	7,500	29,185,359	34,731,320	100%
Nellis Solar Array II ²	15,000	37,311,000	89,546,400	100%
Totals	22,531	66,530,462	124,311,823	100%

⁷ The Annual Report obligations are as set forth in NAC § 704.8879.

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Notes to Table 3-4:

¹ Credit total includes station usage

² Credit total includes the impact of the solar credit multiplier (2.4x)

3.8 2021 New Systems

NAC § 704.8879(2)(b). Whether, during the most recently completed compliance year, the provider began construction on, acquired, or placed into operation any renewable energy system and, if so, the date of any such event.

Nevada Power continues to work on Dry Lake Solar. Dry Lake Solar is a 150 MW company-owned project with a 100 MW (400 MWh) co-located energy storage system. This facility will not be included in Nevada Power's rate base or revenue requirement. Once operational, the facility will sell the energy generated to Nevada Power under a Power Purchase Agreement. The project was approved by the Commission Docket No. 20-07023 and is projected to declare commercial operation on December 31, 2023.

The Company completed one small photovoltaic system, Mojave High School Solar, in December 2021. The project is located at Mojave High School in North Las Vegas and consists of solar covered parking. The company entered into a 15-year lease agreement with the Clark County School District to host the project with an option to extend the lease. The energy generated by the 0.35 MW AC solar array will support the Company's Expanded Solar Access Program. The project was approved by the Commission in Docket No. 20-07023.

3.9 2021 Retail Sales

NAC § 704.8879(2)(c). The total number of kilowatt-hours sold by the provider to its retail customers in this State during the most recently completed compliance year.

The total number of kilowatt-hours sold by Nevada Power in 2021 to its bundled, retail customers was 20,721,171,000. This total includes bundled retail sales sold under a Commission approved ESP tariff where credits are either transferred to a customer or retired on behalf of a customer above and separately from the RPS. After adjusting for the PCs associated with 2021 ESP sales, Nevada Power's adjusted retail sales, the basis for calculating the RPS credit requirement, was 20,712,404,000 kilowatt hours.

3.10 2021 RPS Compliance Total and Summary of RPS Sources

NAC § 704.8879(2)(d). The total number of kilowatt-hours that the provider generated, acquired, or saved from portfolio energy systems or efficiency measures during the most recently completed compliance year and, from that total number of kilowatt-hours, subtotals for the number of kilowatt-hours: (1) generated or saved by the provider from its own portfolio energy systems or efficiency measures; (2) acquired by the provider pursuant to long-term portfolio energy credits contracts; (3) acquired by the provider pursuant to long-term renewable energy contracts; (4) acquired by the provider pursuant to short-term portfolio energy credits contracts; (5) acquired by the provider pursuant to short-term renewable energy contracts; (6) acquired or saved by the provider pursuant to energy efficiency contracts; (7) attributable to the provider from solar thermal systems; (8) fed back to the provider from net metering systems used by customer-generators pursuant to

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NRS §§ 704.766 to 704.775, inclusive; (9) carried forward by the provider from previous compliance years; and (10) saved by the provider as a result of energy efficiency measures installed at service locations of residential customers of the provider for the purposes of paragraph (b) of subsection 2 of NRS § 704.7821.

Table 3-5 Nevada Power 2021 Summary of RPS Sources

	kWh¹ <i>(in 000)</i>
1. Generated or saved from owned portfolio energy systems or efficiency measures	124,312
2. Acquired pursuant to long-term portfolio energy credit contracts	77,913
3. Acquired pursuant to long-term renewable energy contracts	3,449,792
4. Acquired pursuant to short-term portfolio energy credit contracts	0
5. Acquired pursuant to short-term renewable energy contracts	75,345
6. Acquired or saved pursuant to energy efficiency contracts	-- ²
7. Attributable to the provider from solar thermal systems	77,426
8. Fed back to the provider from net metering systems used by customers	641,731
9. Carried forward from previous compliance years ³	1,301,042
10. Saved from energy efficiency measures ⁴	497,098
	6,244,659

Notes to Table 3-5:

¹ 1 kWh = 1 PC, 1,000 kWh (1 MWh) = 1 kPC, totals reflect the solar distributed generation multiplier where applicable

² Amount is included in Row 10.

³ The 1,301,042 kPC value excludes DSM credits carried forward from 2020, 4,467,073 kPCs

⁴ Amount reflects allowable 10% cap, does not include the carry forward of 5,214,620 approved DSM kPCs in Appendix 5.1.

3.11 2021 Credit Sales

NAC § 704.8879(2)(e). The total number of kilowatt-hours that the provider: (1) sold as a result of customer participation in a voluntary option to purchase all or a portion of the customer's energy from renewable resources; and (2) sold pursuant to paragraphs (b) and (c) of subsection 2 of NRS § 704.7828.

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Table 3-6 Nevada Power 2021 Voluntary and Excess Credit Sales

Type of Sale	Total kWh / PCs Sold
Kilowatt-hours sold under a NGR or an approved ESP agreement ¹	293,529,000
Kilowatt-hours sold in excess of 10% but less than 25% of the amount of portfolio energy credits necessary to comply with the subsequent calendar year	0
Kilowatt-hours sold in excess of 25% of the amount of portfolio energy credits necessary to comply with the subsequent calendar year.	0
Kilowatt-hours sold other ²	7,200,000

Notes to table 3-6

¹ 2021 NGR Option 2 Transfers:

- Switch, Switch Station 1, Docket No. 15-07003, 284,762,000 PCs. The Switch kPCs would not be included in any Nevada Power retail sales adjustment as Switch is not a fully-bundled service customer.
- Lumen Group, LLC, Docket No 19-12017, 8,767,000 PCs, to be transferred to Lumen Group under a Commission approved ESA. Lumen is a fully-bundled customer of Nevada Power.

² As approved in Docket No. 19-05006, 600,000 PCs per month are to be transferred to Sierra. The credits transferred will be used by Sierra to meet a three-year NGR commitment that it entered into with Truckee Meadows Community College.

3.12 2021 Carry Forwards

AC § 704.8879(2)(f). The total number of kilowatt-hours that the provider intends to carry forward from the most recently completed compliance year.

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Table 3-7 Nevada Power 2021 Carry Forward

Surpluses	Vintage	kPCs ¹		kPCs ¹
		Non-DSM	DSM ³	Total
1 Carried forward as excess from the previous compliance years ² ;	2015		939,227	939,227
	2016		1,355,848	1,355,848
	2017		773,536	773,536
	2018		692,045	692,045
	2019		706,417	706,417
	2020	1,301,042		1,301,042
	Total	1,301,042	4,467,073	5,768,115
2 Intends to carry forward as excess from the most recently completed compliance year;	2021	1,273,682	596,308	1,869,990
	Total	1,273,682	596,308	1,869,990
3 Intends to carry forward as excess from the previous compliance years;	2015		442,129	442,129
	2016		1,355,848	1,355,848
	2017		773,536	773,536
	2018		692,045	692,045
	2019		706,417	706,417
	2020		648,337	648,337
	Total	0	4,618,312	4,618,312
Total	1,273,682	5,214,620	6,488,302	

Deficiencies

4 Carried forward as deficiencies from the previous compliance years;	Not applicable
5 Intends to carry forward as deficiencies from the most recently completed compliance year; and	Not applicable
6 Intends to carry forward as deficiencies from previous compliance years	Not applicable

1 1 kPC = 1,000 kWh or 1,000 kPC

2 Reference Docket No. 21-04019

3 2021 DSM carry forward includes credits derived from the 2020 and 2021 verification and measurement (M&V) reports which were approved in 2022

3.13 2022 Estimated Sales

NAC § 704.8879(2)(g). The estimated number of kilowatt-hours that the provider expects to sell to its retail customers in this State during the current compliance year.

The total number of kilowatt-hours expected to be sold by Nevada Power in 2022 is estimated to be 20,330,272,000. This estimate includes sales to NGR Option 1 customers and sales to customers

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under Commission approved Energy Supply Agreements but excludes customers that have received Commission approval to purchase their energy from an alternative supplier.⁸

3.14 2022 Estimated Credit Requirement

NAC § 704.8879(2)(h). The estimated number of kilowatt-hours that the provider must generate, acquire, or save from portfolio energy systems or efficiency measures to comply with its portfolio standard for the current compliance year, as calculated by the provider pursuant to NAC §704.8877.

Table 3-8 Nevada Power 2022 Estimated RPS Credit Requirement

	kWh ¹
Estimated 2022 Retail Sales ¹	20,330,272,000
Less Bundled Retail Sales under a Commission-approved tariff ²	197,310,000
Estimated Retail Sales Subject to the RPS	20,132,962,000
29% RPS Requirement	5,838,559,000
10% DSM Allowance	583,856,000

Notes to Table 3-8:

¹ 2022 Estimated Bundled Retail Sales

² 2019 Nevada Senate Bill 358 allows utilities to exclude the PCs associated bundled retail sales subject to a Commission-approved green tariff /Energy Supply Agreement where renewable energy credits are either transferred to or retired on behalf of a bundled customer and are not applied towards the annual RPS requirement

3.15 2022 Estimated Costs

NAC § 704.8879(2)(i). If the provider is a utility provider, the estimated costs for the utility provider to comply with its portfolio standard for the current compliance year. If appropriate, the utility provider must report such estimated costs for each major type of cost, such as general and administrative costs and costs for purchased power.

Table 3-9 Nevada Power 2022 Estimated RPS Compliance Costs

	\$
<u>Renewable Energy</u>	
Purchase Power and PC Expenditures	\$298,255,000
General & Administrative Expenditures	879,000

⁸ Joint 2022-2041 Integrated Resource Plan, base retail sales forecast, reference Docket 21-06001.

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Company-Owned O&M	675,000
Development ⁹	0
Total	\$299,809,000

Notes to Table 3-9:

Excludes: (1) other ancillary department costs such as legal, contract administration, transmission & accounting, which are not exclusively dedicated to renewable activities; and (2) costs which are included in general rates from prior rate cases.

Excludes: 2022 estimated DR and DSM program expenditures. Credits derived from post-2020 programs can no longer be used towards RPS compliance.

3.16 2021 Affirmative Showing of RPS Compliance

Per NAC § 704.8879(3), Nevada Power must make an affirmative showing that it complied with its portfolio standard during the most recently completed compliance year.

As described herein, Nevada Power exceeded the RPS credit requirements (24 percent of retail sales) for the calendar year ending 2021 with 30.1 percent of retail sales met by RPS-eligible resources.

Table 3-10 Nevada Power 2021 RPS Compliance Summary

	kPC ¹
Overall RPS Summary	<i>(In thousands)</i>
Total Credits	6,244,659
24% RPS Credit Requirement ²	4,970,977
Cumulative RPS Position (+/-)	1,273,682

Notes to Table 3-10:

¹ 1 kWh = 1 PC, 1,000 kWh (1 MWh) = 1 kPC² Based on 2021 retail sales of 20,721,171 MW hours less ESA credits totaling 8,767 kPCs

² The 1,273,628 kPC surplus total excludes surplus 2021 DSM credits which total 5,214,620 kPCs

Additional detail for 2021 and projected estimates for 2022 and the plan period of 2023 through 2025, including a breakdown by renewable facility, are provided in Appendix 5.1 of this report.

3.17 2021 Attestations

Since Nevada Power acquired kilowatt-hours from renewable energy systems that are not owned, operated, or controlled by it to comply with its portfolio standard during 2021, NAC § 704.8879(4) requires Nevada Power to provide separate attestations from the owner or operator of the

⁹ Development incurred for Dry Lake Solar and Nevada Power’s share of Hot Pot and Iron Point are excluded. All three projects enter into PPA with the utility. When completed, the energy delivered will be purchased under the PPA with the utility. That cost will be included in the category “Purchase Power and PC Expenditures.”

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renewable energy system that the energy represented by those kilowatt-hours: (a) has not been and will not be sold or otherwise exchanged for compensation or used for credit in any other state or jurisdiction; and (b) has not been and will not be included within a blended energy product certified to include a fixed percentage of renewable energy in any other state or jurisdiction. These individual attestations and a summary table of the attestations are provided in Appendix 5.3.

3.18 2021 Joint Pooling Arrangement between Nevada Power and with Sierra

As approved by the Commission in Docket No. 08-04002, Nevada Power and Sierra created a joint pool of solar and non-solar PCs that consists of PCs contributed when either company exceeded its respective RPS obligations. Pursuant to the Pooling Agreement, these surplus PCs would be available to either utility if they were unable to meet their RPS obligations in a calendar year, provided that the utility repay to the lending utility’s account before the lending utility required the PCs for compliance. Nevada Power withdrew a total of 2,772,360 non-solar kPCs and 21,431 solar kPCs from the pool in 2007, 2008 and 2009. Nevada Power began repayment of its obligation to the pool in 2011 ending 2020 with an outstanding balance of 538,438 non-solar kPCs.¹⁰ Nevada Power repaid 538,438 kPCs in 2021. This will be the final reporting on the status of the joint credit pool. The balance is now zero, and both utilities have no immediate plans to setup a new pooling arrangement.

Table 3-11 Nevada Power Joint Pool Accounting

Nevada Power Credits Owed to Sierra in Pool

Non-Solar/Non-DSM Account Obligation	
Non-Solar/Non-DSM Credits Owed (kPCs) ¹	538,438
Non-Solar/Non-DSM Credits Repaid to Pool in 2021 (kPCs)	(538,438)
Ending Balance	0

Notes to Table 3-11:

1. Reference Docket No. 21-04019, Table 3-11, for beginning balance owed SPPC

3.19 2021 DSM Contribution

The Commission’s Order in Docket No. 21-04019 authorized Nevada Power to carry forward 4,467,073 pre-2020 demand-side-management kPCs. Compliance year 2020 resulted in 648,336.6 DSM derived kPCs and compliance year 2021 596,308.2 DSM derived kPCs (reference Appendix 5.6. for details). Collectively, these three totals will provide more than a sufficient number of PCs to fill the 10 percent allotment from efficiency measures that is allowed to meet the current year’s RPS credit standard. DSM Credits available for 2021 compliance that are in excess of the ten percent limit will be banked and applied towards Nevada Power’s 2022 compliance.

In this filing, the company is requesting to discontinue the practice of delaying the certification and use of DSM from the previous calendar. The reason for the request is twofold. First, only credits from pre-2020 efficiency programs can qualify for certification The efficiency programs

¹⁰ Reference Docket No. 21-04019, Table 3-11 for the 2020 ending balance.

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outlined in Appendix 5.6. have already been vetted, so there are no new programs to review. Second, actual retail sales for both 2020 and 2021 are known. Staff has the information needed to confirm the number of credits generated during the 2021 calendar year without having to delay the process until 2023.

Although this request does not benefit Nevada Power, it does benefit Sierra. Nevada Power has more than a sufficient number of certified DSM-derived credits to fill DSM percentage contribution allowable under the statutes through 2024. The only impact to Nevada Power is the number of stranded DSM credits which can no longer be used after 2024 will increase.

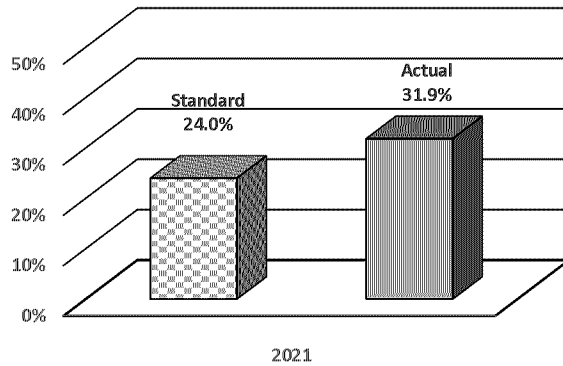
Please reference Section 4.20, 2021 DSM Contribution, for more information on how this change benefits Sierra and Sierra's customers.

4. Sierra Pacific Power Annual Report Requirements

4.1 2021 Sierra Overview

Sierra exceeded the 2021 RPS requirement ending 2021 at 31.9 percent. The RPS percentages shown below are based on overall credit requirement of 2,094,780 kPCs and a total of 2,779,966 eligible credits. Ignoring DSM credits in excess of the 10 percent limit, SPPC ended 2021 with a net surplus of 685,186 kPCs.

FIGURE 3. 2021 SIERRA RPS STANDARD VS ACTUAL PERCENTAGE



Sierra ended 2021 with approximately 691.5 MW of renewable capacity in service.¹¹ Like Nevada Power, all 691.5 MW are located in Nevada providing green energy to meet the needs of Sierra’s customers. In 2021, Sierra added one new utility scale project, Battle Mountain Solar. Battle Mountain Solar is a 101 MW solar facility with 25 MW of storage capacity. The project was approved by the Commission in Docket No. 18-06003. Battle Mountain is located near the city of Battle Mountain in Lander County, Nevada. The facility declared commercial operation on June 23, 2021.

In addition to the 691.5 MW of renewable capacity currently in operation, Sierra ended 2021 with six photovoltaic projects totaling 824 MW of new generation in various stages of development and construction. All of six projects include co-located battery storage. Battery storage offers flexibility by giving Sierra the ability to store generation when demand and prices are low and releasing it back to the grid when demand and prices start to rise. This helps to optimize must take renewable resources, like solar photovoltaic and wind, where generation and load do not always align.

Table 4-1 below is a list of the Sierra pipeline projects showing the facility name, resource type, approval docket number, projected commercial operation date, nameplate capacity (AC), storage capacity and energy and capacity allocation as approved by the Commission in the approval order.

¹¹ The 691.5 MW is calculated based on dividing the Nevada Solar One 69-MW agreement between Nevada Power (46.9 MW) and Sierra (22.1 MW), as previously approved by the Commission. It excludes Hooper Hydro .8-MW where Sierra does not claim the PCs from the generation.

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Table 4-1 Sierra Pipeline Generation as December 31, 2021

Facility	Resource Type	Approval Docket No.	Projected COD	Nameplate MW AC	Storage Capacity	Energy / Capacity Allocation	
						SPPC	NPC
Dodge Flat	Solar PV	18-06003	02/12/22	200	50	200	
Fish Springs	Solar PV	18-06003	02/25/22	100	25	100	
Moapa (Arrow Canyon) Solar ^a	Solar PV	19-06039	12/01/22	200	75	140	60
Iron Point ^b	Solar PV	21-06001	12/01/23	250	200	110	140
Southern Bighorn Solar Farm ^a	Solar PV	19-06039	09/01/23	300	135	120	180
Hot Pot ^b	Solar PV	21-06001	12/01/24	350	350	154	196
				1,400	835	824	576

Notes to Table 4-1

- a. The energy/capacity of the project as allocated between Nevada Power and Sierra per the order (Docket No. 19-06039)
- b. The energy/capacity of the project as allocated between Nevada Power and Sierra per the order (Docket No. 21-06001)

4.2 2021 NV GreenEnergy Rider Tariff

In 2013, Sierra sought and received Commission approval for the Nevada GreenEnergy Rider program. The NGR is a voluntary program open to Sierra’s residential and non-residential customers. Option 1 of the Northern NV GreenEnergy Rider allows customers of any class to purchase either 50 percent or 100 percent of their energy needs from renewable resources. Option 2 allows customers of GS-2 class or larger to enter into a special contract with Sierra for the environmental attributes produced by a specific renewable resource.

As of December 31, 2021, 98 customers were enrolled in the NGR Option 1 tariff. Per the terms of the tariff, Sierra will retire 930 kPCs separately and in addition to credits retired under the RPS. Sierra billed a total of \$13,184 dollars in 2021 under the tariff. The offsetting expense incurred to administer Option 1 of the tariff was de minimis. Appendix 5.4 is a detailed schedule showing NGR Option 1 customers by class and listing the total dollars billed under the tariff in 2021.

The company launched a new NGR program or open season in February 2022. The program, which was approved by the Commission in Docket No. 21-09019, is open to both residential and non-residential customers of Sierra. The program is designed to help customers achieve their sustainability goals and to help drive clean energy development in Nevada. Sierra is initially targeting 2 MW for residential and 33 MW for non-residential customers.¹² The company conducted an open season in February where interested customers enroll in the new NGR tariff. The tariff rates will become applicable starting on July 1, 2022. Please refer to Docket No. 22-04006 for details on the tariff and the results of the first open enrollment season.

Sierra has three customers – Apple, Switch and Truckee Meadows Community College (TMCC) with which it has entered into an Option 2 NGR agreement. Under the first agreement, Apple is

¹² The number of credits set aside is based on the average capacity factor for solar (30 percent). For 2022, Sierra is estimating the numbers of credits needed to cover the program at 45,990 kPCs (35*8,760*.3*.5). This total assumes that all 35 MWs initially set aside are subscribed. The exact number of credits set side will be drive by customer interest. The total is also cut in half for 2022 as it would only be in effect for half of the year.

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receiving the renewable energy credits from Fort Churchill Solar Array which commenced operation in August 2015. Per the agreement, in 2021 Sierra received an annual ground lease payment and operates the facility. The energy generated by the Fort Churchill Solar Array is delivered to Sierra's system. Apple retains ownership of the renewable credits associated with the generation. The credits are used by Apple to offset the energy consumption of its data center. The Fort Churchill lease agreement was approved by the Commission in Docket No. 13-07005. The facility was purchased by Sierra in late December 2021. The purchase was approved by the Commission in Docket No. 21-06001. In 2021, the solar array generated 30,511 MWh of renewable energy with an equal number of renewable energy credits transferred to Apple.

Subsequent to the Fort Churchill NGR, Apple and Sierra entered into a second NGR transaction for 50 MW from a solar photovoltaic project Boulder Solar 2 located in Clark County, Nevada. This agreement was approved by the Commission in Docket No. 15-11025. Boulder Solar 2 project successfully completed commissioning in January 2017. In 2021, the Boulder Solar II generated 129,811 MWh of renewable energy with an equal number of renewable energy credits transferred to Apple.

Sierra received Commission approval to enter into a third NGR agreement with Apple for the renewable credits from a renewable project, Techren Solar 2. Techren Solar 2 is a 200 MW photovoltaic facility also located in Clark County, Nevada. This agreement was approved by the Commission in Docket No. 17-02008. Techren Solar 2 successfully completed commissioning in October 2019. In 2021, the Techren Solar 2 generated 556,157 MWh of renewable energy with an equal number of renewable energy credits transferred to Apple.

Sierra received Commission approval for a fourth NGR agreement with Apple for the renewable energy credits from a new renewable energy project, Turquoise Nevada Solar. Turquoise Nevada Solar is a 50 MW photovoltaic facility located in the Reno Technology Park near Reno, Nevada. This agreement was approved by the Commission in Docket No. 17-11002. The project successfully completed commissioning on December 7, 2020. In 2021, Turquoise Nevada Solar generated 103,871 MWh of renewable energy with an equal number of renewable energy credits transferred to Apple.

In 2015, Sierra entered into an NGR agreement with Switch for 65 percent of the output from a 79 MW photovoltaic project, Switch Station 2, located in Clark County, Nevada. The agreement was approved by the Commission in Docket No. 15-11025. The balance of the renewable attributes from the project are assigned to Switch under a companion agreement with Nevada Power. The Switch Station 2 NGR agreement was modified per a January 17, 2018, notice from Switch and starting April 17, 2018, one hundred percent of the energy and credits were assigned to Sierra and Sierra's companion NGR agreement with Switch. In 2020, Switch Station 2 produced 206,461 MWh of renewable energy.

In 2016, Switch received Commission approval to purchase its energy, capacity and/or ancillary services from a provider of new electric services for its operations in both Utilities' service territories. Switch's 704B application was approved in Docket No. 16-09023. Switch began purchasing its energy from an alternative supplier beginning June 1, 2017. Although Switch is no longer a bundled customer, Switch will continue to purchase PCs from Switch Station 2 for the duration of the agreement.

Finally, Sierra received Commission approval in 2019 to enter into a NGR agreement with TMCC (Docket No. 19-05006). Under the agreement, Sierra will sell and TMCC will purchase 7,200 kPCs

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from Techren 1 under a three-year NGR agreement commencing December 1, 2019. Since Techren 1 is a Nevada Power facility, the NGR includes a companion sales agreement whereby Nevada Power will sell 7,200 kPCs to Sierra that it in turn will sell to TMCC.

Table 4.6 in Section 4.12., Credit Sales, summarizes all credits committed by Sierra in 2020 under both Option 1 and Option 2 of the NGR tariffs.

4.3 2021 704B Agreements

In 2018, Caesars Enterprise Services, LLC, received Commission approval to purchase its energy, capacity and/or ancillary services from a new provider of electrical resources. Caesars’s 704B request for Sierra’s service territory was approved by the Commission in Docket No. 16-11035. In 2017, Peppermill Casinos received Commission approval to purchase its energy, capacity and/or ancillary services from a new provider of electrical resources. The Peppermill’s 704B request for Sierra’s service territory was approved by the Commission in Docket No. 17-05014. Both Caesars and Peppermill exited Sierra as bundled customers in 2018. Table 4-1 below summarizes Sierra’s credit obligation to both customers. Note, Sierra’s obligation to provide credits to Caesars and the Peppermill per the exit orders terminated in 2021.

Table 4-2 Sierra 2021 704B Credit Obligation (in kPCs)

2021	
Caesars	
➤ Non-Solar	4,250
➤ Solar	0
Total	4,250
Peppermill	
➤ Non-Solar	2,568
➤ Solar	0
Total	2,568

Table 4-2 notes:

1. Sierra’s credit obligation to Caesars and the Peppermill as stated in the exit orders

4.4 2021 Other Credit Obligations

In 2010, Sierra received authority to transfer control of the assets and operations comprising its California electric distribution system to California Pacific Electric Company, LLC (“CalPeco”), now Liberty Utilities (“Liberty”). As a result of this transfer, Sierra no longer has a California RPS obligation. Sierra has since entered into several supply agreements with Liberty which spelled out Sierra’s obligations to provide energy and capacity to Liberty. These agreements included an obligation on the part of Sierra to supply California eligible renewable energy credits to Liberty.

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The current agreement, dated August 21, 2020, covers the period December 30, 2020, through December 29, 2025. Under the terms of this agreement, Sierra will provide renewable energy credits to Liberty based on total megawatt hour sales, and whether Liberty added new renewable projects during the term of the agreement. The table below outlines Sierra’s obligation to provide Liberty with renewable energy credits per current supply agreement.

Table 4-3 Sierra’s Credit Obligation to Liberty

Renewable Percentage		
Year	Additional Projects	No Additional Projects
2021	5.0%	5.0%
2022	5.0%	5.0%
2023	16.0% (6 months)	16.0%
2024	0%	20.0%
2025	0%	24.0%

Under the current agreement, Sierra’s 2021 credit obligation to Liberty is five percent. This equates to 22,400 kPCs. In addition to 22,400 kPCs due for 2021 energy sales, a meter error was discovered in 2021 that impacted 2019 and 2020 sales. The error resulted in an additional credit obligation of 1,607 credits (335 for 2019 and 1,272 for 2020), bringing the total number of California eligible credits to be transferred to Liberty for 2021 to 24,007 kPCs.

4.5 2022 Compliance Outlook

Sierra’s compliance outlook is cautiously optimistic. Like Nevada Power, Sierra has been very successful in building a pipeline of new projects to meet its future credit and renewable energy needs. But, as stated in the past filings, no outlook is without risk. The biggest risks facing Sierra today are operational delays and project cancelations. Like Nevada Power, Sierra too is experiencing operational delays. Sierra had two projects that were scheduled to begin operating in 2021 but were delayed to early 2022. The first, Dodge Flat is a 200 MW solar facility with 50 MW of storage. That project was scheduled to declare commercial operation on December 1, 2021. The second, Fish Springs Ranch, is a 100 MW solar facility with 25 MW of storage. It was also scheduled to declare commercial operation on December 1, 2021. The COD for both facilities was pushed out and both did not start delivery of test energy until February 2022. Although the delay was only a few months and occurred at a time of low output, it still has an impact. Like Nevada Power, all of Sierra’s pipeline projects are solar, and difficulty procuring panels, racking, cabling, transformers, and other critical hardware is not unique to just Nevada Power pipeline projects. Supply chain disruptions are now part of doing business in a post COVID world, and it is possible that other projects may experience similar or worse delays.¹³ Unlike Nevada Power, Sierra doesn’t have the same level of cushion to absorb energy losses stemming from COD related delays. Also,

¹³ Delays are an evolving challenge and both utilities will continue to adjust their outlooks and to take correction action as new information and alternatives become available.

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unlike Nevada Power, Sierra faces the additional challenge of growing its renewable capacity while also having to backfill capacity lost due to expiring PPAs.¹⁴

Finally, both utilities face the same worst-case scenario that one or more of the pipeline projects is cancelled. Delays and component shortages can drive up costs to a point where a project that was previously economical becomes uneconomical. Unlike delayed projects where a project might be able to deliver some level of energy during a protracted construction/commissioning process, canceled projects deliver nothing and can take four or more years, from the start of procurement efforts to COD, to replace.

In summary, while Sierra is currently positioned to meet its future credit commitments (RPS, NGR and ESA obligations), experience has shown that renewable projects, both operating and pipeline, are unpredictable. To this end, Sierra will continue explore all options, including continuing to issue renewable energy RFPs and exploring short-term purchase agreements that benefit customers, so that it can procure the renewable generating resources needed to continue its commitment to becoming carbon-free. To this end, the RPS is the floor.

4.6 2021 Surplus Credit Calculations

Table 4-3 below shows the calculation of the surplus credits required under Nevada Revised Statutes 704.7828. DSM credits, which are subject to limitations and likely have no value other than to Nevada Power and Sierra, were excluded. After this adjustment, Sierra will end 2021 with a surplus of 133,221 kPCs in excess of the 25 percent threshold of 551,965 kPCs. As required under the statute, Sierra will market the 133,221 kPCs. The decision to execute a sale will take into consideration the proceeds received from selling the surplus credits, and the status of the three projects scheduled to declare commercial operation in 2022. If one or more of these pipeline projects is delayed, the company may not execute a sale. The overarching policy is to never place future compliance at risk by selling credits that could be needed at a later time.

Table 4-4 Sierra 2021 Surplus Carry Forward Test

Surplus Non-DSM Credits		685,186
Surplus DSM Credits		<u>380,805</u>
Total Surplus Credits		1,065,991
Less DSM Credits		<u>380,805</u>
Surplus Unrestricted Credits		685,186
Estimated 2021 Credit Requirement		2,207,861
	10%	220,786
	25%	551,965

¹⁴ This does not imply that the Companies would rule out renewing existing agreements. Rather, it recognizes the uncertainty as to whether the resource and equipment are capable of supporting ongoing generation, and whether the Companies and the counterparty can come to terms on renewing the agreement.

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Credits in Excess of Thresholds	10%	464,400
	25%	133,221

4.7 2022 Surplus Marketing Efforts & Outcome

Nevada Revised Statute 704.7828 requires that if surplus credits from a given year exceed more than 10 percent but less than 25 percent of the amount of portfolio credits necessary to comply with the portfolio standard for the subsequent year, the provider may sell any credits in excess of 10 percent of the amount of portfolio energy credits necessary to comply with its portfolio standard for the subsequent year. The statute also states that if surplus credits from a given year exceed more than 25 percent of the amount of portfolio credits necessary to comply with the portfolio standard for the subsequent year, the provider shall use reasonable efforts to sell any credits in excess of the 25 percent of the amount of portfolio energy credits necessary to comply with its portfolio standard for the subsequent year.

Sierra ended 2020 with a surplus credit balance of 1,081,867 kPCs. This surplus balance is composed of non-solar, non-DSM credits, solar credits and DSM credits. The table below shows the calculations the company used to determine Sierra’s excess credit balance to market under the statute.

Sierra chose not to include surplus DSM credits totaling 388,860 kPCs in the above calculation. This classification of credits is limited in use by statute, scheduled to be phased-out, and cannot be used to meet RPS compliance in neighboring states. Sierra also may have a need for these credits before the ability use them expires after compliance year 2024.

Table 4-5 Sierra 2020 Surplus Carry Forward Test

Surplus Non-DSM Credits		693,007
Surplus DSM Credits		<u>388,860</u>
Total Surplus Credits		1,081,867
Less DSM Credits		<u>388,860</u>
Surplus Unrestricted Credits		693,007
Estimated 2021 Credit Requirement		2,026,480
(Per the 2020 Annual Compliance Filing)	10%	202,648
	25%	506,620
Credits in Excess of Thresholds	10%	490,359
	25%	186,387

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Sierra issued a reverse RFP on September 13, 2021, to solicit offers from interested parties wishing to purchase unbundled PCs. The offer was issued to NVE’s regular energy trading partners, renewable energy credit brokers, and its distribution only service (“DOS”) customers. Appendix 5.6 is the copy of the offer including all terms and conditions and a breakdown of the 186,387 surplus credits offered up for sale by technology, state certification and vintage. Appendix 5.7 is a distribution list of recipients who received the offer. The company received a total of seven bids. Confidential Appendix 5.8 summarizes the bids received: the bidder, quantity requested, price offered per kPC, and any qualifiers (CEC eligible, Green-e® listed, etc.)

Sierra chose to not execute a sale agreement. The reason for this decision came down to the fact that Sierra may need the credits. Although Sierra currently enjoys a credit surplus, the outlook indicates that Sierra could be facing challenges in the near-term. Sierra has credit commitments beyond the RPS, such as an agreement to provide credits per an energy supply agreement or under a Commission-approved green energy tariff. Until the current pipeline new projects declare COD, it is not in Sierra’s or its customer’s best interest to sell credits in 2021 that could potentially be needed in the future. This is especially true given that the number of options to obtain replacement credits within the next three years is very limited.

The following pages contain the reporting information required by Section 704.8879 of the Nevada Administrative Code for annual reporting by providers of electric service.¹⁵ For convenience, Sierra has listed the specific requirements of the 2020 Annual Report as set forth in Clause (2) of NAC § 704.8879.

4.8 2021 Capacity

NAC § 704.8879(2)(a). The capacity of each renewable energy system owned, operated or controlled by the provider, the total number of kilowatt-hours generated by each such system during the most recently completed compliance year and the percentage of that total amount which was generated directly from renewable energy.

Table 4-6 Sierra 2021 Owned Renewable Energy Capacity

System Name	Capacity (kW)	2021 Generation (kWh)	2021 Credits (PCs)	% from Renewable Energy
Sierra Plaza PV	75	0	0	100%
Sierra Plaza Tracking PV	1	2,465	2,465	100%
Fleet Building Solar	75	1,546	1,546	100%
Fort Churchill Solar Array ¹	19,500	30,511,059	30,511,059	100%
	19,651	30,515,070	30,515,070	100%

1. The Fort Churchill Solar Array was purchased from Apple in December 2021. The purchase was approved by the Commission in Docket No. 21-06001. The credits from the energy produced by the array are assigned to Apple under an NGR Option 2 agreement which was approved by the Commission in Docket No. 13-07005

¹⁵ The annual report obligations are as set forth in NAC § 704.8879.

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4.9 2021 New Systems

NAC § 704.8879(2)(b). Whether, during the most recently completed compliance year, the provider began construction on, acquired or placed into operation any renewable energy system and, if so, the date of any such event.

The Fort Churchill Solar Array was purchased by Sierra from Apple after receiving Commission approval in late December 2021. The purchase was approved by the Commission in Docket No. 21-06001. The credits from the energy produced by the array are assigned to Apple under an NGR Option 2 agreement. That agreement was approved by the Commission in Docket No. 13-07005.

4.10 2021 Retail Sales

NAC § 704.8879(2)(c). The total number of kilowatt-hours sold by the provider to its retail customers in this State during the most recently completed compliance year.

The total number of kilowatt-hours sold by Sierra in 2021 to its bundled, retail customers was 9,556,728,000. This total includes bundled retail sales sold under a Commission approved NGR tariff where the credits are either transferred to the customer or retired on behalf of the customer above and separately from the RPS. After adjusting for the NGR sales and Sierra's adjusted retail sales, the basis for calculating the RPS credit requirement was 8,728,248,000 kilowatt hours.

4.11 2021 RPS Compliance Total and Summary of RPS Sources

NAC § 704.8879(2)(d). The total number of kilowatt-hours that the provider generated, acquired or saved from portfolio energy systems or efficiency measures during the most recently completed compliance year and, from that total number of kilowatt-hours, subtotals for the number of kilowatt-hours: (1) generated or saved by the provider from its own portfolio energy systems or efficiency measures; (2) acquired by the provider pursuant to long-term portfolio energy credits contracts; (3) acquired by the provider pursuant to long-term renewable energy contracts; (4) acquired by the provider pursuant to short-term portfolio energy credits contracts; (5) acquired by the provider pursuant to short-term renewable energy contracts; (6) acquired or saved by the provider pursuant to energy efficiency contracts; (7) attributable to the provider from solar thermal systems; (8) fed back to the provider from net metering systems used by customer-generators pursuant to NRS § 704.766 to 704.775, inclusive; (9) carried forward by the provider from previous compliance years; and (10) saved by the provider as a result of energy efficiency measures installed at service locations of residential customers of the provider for the purposes of paragraph (b) of subsection 2 of NRS § 704.7821.

Table 4.7 Sierra 2021 Summary of RPS Sources

kWh¹

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	<i>(in 000)</i>
1. Generated or saved from owned portfolio energy systems or efficiency measures	4
2. Acquired pursuant to long-term portfolio energy credit contracts	7,763
3. Acquired pursuant to long-term renewable energy contracts	1,445,126
4. Acquired pursuant to short-term portfolio energy credit contracts	259,013
5. Acquired pursuant to short-term renewable energy contracts	0
6. Acquired or saved pursuant to energy efficiency contracts	-- ²
7. Attributable to the provider from solar thermal systems	36,464
8. Fed back to the provider from net metering systems used by customers	129,112
9. Carried forward from previous compliance years ³	693,006
10. Saved from energy efficiency measures ⁴	209,478
	2,779,966

Notes to Table 4-7:

1. 1 kWh = 1 PC, 1,000 kWh (1 MWh) = 1 kPC, totals reflect the solar distributed generation multiplier where applicable
2. Amount is included in Row 10.
3. The 693,006 kPC value excludes DSM credits carried forward from 2020
4. Amount reflects allowable 10% cap, does not include the 2021 carry forward of 380,805 excess DSM kPCs to 2022 as shown in Appendix 5.2.

4.12 2021 Credit Sales

NAC § 704.8879(2)(e). The total number of kilowatt-hours that the provider: (1) sold as a result of customer participation in a voluntary option to purchase all or a portion of the customer's energy from renewable resources; and (2) sold pursuant to paragraphs (b) and (c) of subsection 2 of NRS § 704.7828.

Table 4.8 Sierra 2021 Voluntary and Excess Credit Sales

Type of Sale	Total kWh / PCs Sold
Kilowatt-hours sold under a Nevada GreenEnergy Rider Option 1 or 2 agreement. ¹	1,034,939,059
Kilowatt-hours sold in excess of 10 percent but less than 25 percent of the amount of portfolio energy credits necessary to comply with the subsequent calendar year	0

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Kilowatt-hours sold in excess of 25 percent of the amount of portfolio energy credits necessary to comply with the subsequent calendar year	0
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Notes to Table 4.8:

- NGR Option 2, Apple, Fort Churchill, Docket No. 13-07005 30,511,059 PCs
- NGR Option 2, Apple, Boulder Solar II, Docket No. 15-11025 129,811,000 PCs
- NGR Option 2, Apple, Techren 2, Docket No. 17-02008 556,157,000 PCs
- NGR Option 2, Apple, Turquoise, Docket No. 17-11002 103,871,000 PCs
- NGR Option 2, Switch, Switch Station II, Docket No. 15-11025 206,461,000 PCs
- NPC Option 2, TMCC, Techren 1, Docket No. 19-05006, 7,200,000 PCs
- NGR Option 1, Northern NV Green Energy Choice 930,000 PCs
- The Switch kPCs are not included in Sierra’s 2020 retail sales adjustment as Switch is not a fully-bundled customer.

4.13 2021 Carry Forwards

NAC § 704.8879(2)(f). The total number of kilowatt-hours that the provider intends to carry forward from the most recently completed compliance year.

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Table 4.9 2021 Sierra Carry Forward

Surpluses	Vintage	kPCs ¹		kPCs
		Non-DSM	DSM ³	Total
1 Carried forward as excess from the previous compliance years ² ;	2016	0	26,213	26,213
	2017	0	148,797	148,797
	2018	0	110,474	110,474
	2019	0	103,376	103,376
	2020	693,006		693,006
	Total	693,006	388,860	1,081,866
2 Intends to carry forward as excess from the most recently completed compliance year;	2021	685,186	95,098	780,284
	Total	685,186	95,098	780,284
3 Intends to carry forward as excess from the previous compliance years;	2018		76,006	76,006
	2019		103,376	103,376
	2020		106,325	106,325
	Total	0	285,708	285,708
	Total	685,186	380,805	1,065,991

Deficiencies

4 Carried forward as deficiencies from the previous compliance years;	Not applicable
5 Intends to carry forward as a deficiencies from the most recently completed compliance year; and	Not applicable
6 Intends to carry forward as deficiencies from previous compliance years	Not applicable

1 1 kPC = 1,000 kWh or 1,000 kPC

2 Reference Docket No. 21-04019

3 2021 DSM carry forward includes credits derived from the 2020 and 2021 verification and measurement (M&V) reports which were approved in 2022

4.14 2022 Estimated Retail Sales

NAC § 704.8879(2)(g). The estimated number of kilowatt-hours that the provider expects to sell to its retail customers in this State during the current compliance year.

The total number of kilowatt-hours expected to be sold by Sierra Pacific Power in 2022 is estimated to be 8,539,498,000. This estimate includes sales to NGR customers but excludes sales to customers who have received Commission approval to purchase their energy from an alternative supplier. 2022 bundled sales under a Commission approved NGR tariff are estimated to be 926,185,000 kWh.¹⁶

¹⁶ Joint 2022-2041 Integrated Resource Plan, base retail sales forecast, reference Docket 21-06001.

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4.15 2022 Estimated Credit Requirement

NAC § 704.8879(2)(h). The estimated number of kilowatt-hours that the provider must generate, acquire or save from portfolio energy systems or efficiency measures to comply with its portfolio standard for the current compliance year, as calculated by the provider pursuant to NAC § 704.8877.

Table 4.10 Sierra 2022 Estimated RPS Credit Requirement

	kWh
Estimated 2022 Bundled Retail Sales ¹	8,539,498,000
Less Estimated Bundled Retail Sales under a Commission Approved Green Tariff ²	(926,185,000)
Estimated Retail Sales Subject to the RPS	7,613,314,000
29% RPS Requirement	2,207,861,000
10% DSM Allowance	220,786,000

Notes to Table 4.10:

1. 2022 Estimated Bundled Retail Sales

2. 2019 Nevada Senate Bill 358 allows utilities to exclude the PCs associated with bundled retail sales subject to a Commission-approved green tariff where the renewable energy credits are either transferred to or retired on behalf of the customer and are not applied towards the annual RPS requirement

4.16 2022 Estimated Costs

NAC § 704.8879(2)(i). If the provider is a utility provider, the estimated costs for the utility provider to comply with its portfolio standard for the current compliance year. If appropriate, the utility provider must report such estimated costs for each major type of cost, such as general and administrative costs and costs for purchased power.

Table 4.11 Sierra 2022 Estimated RPS Compliance Costs

<u>Renewable Energy</u>	\$
Purchase Power and PC Expenditures	\$124,470,000
Company-Development	0
General & Administrative Expenditures	879,000
Company-Owned O&M	210,000
	\$125,559,000

Notes to Table 4-9:

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Excludes: Ancillary department costs such as legal, contract administration, transmission & accounting, which are not exclusively dedicated to renewable activities; and (2) costs which are included in general rates from prior rate cases.

Excludes: 2022 estimated DR and DSM program expenditures. Credits derived from post-2020 programs can no longer be used towards RPS compliance.

4.17 2021 Affirmative Showing of RPS Compliance

Per Section 704.8879(3) of the Nevada Administrative Code, Sierra must make an affirmative showing that it complied with its portfolio standard during the most recently completed compliance year.

As described herein, Sierra exceeded the RPS credit requirements (24 percent of retail sales) for the calendar year ending 2021 with 30.2 percent of retail sales met by RPS-eligible resources.

Table 4.12 Sierra 2021 RPS Compliance Summary

<u>Overall RPS Summary</u>	kPCs¹
Total Credits	2,779,966
24% RPS Requirement ²	2,094,780
Cumulative RPS Position (+/-)	685,186

Notes to Table 4-12:

¹ 1 kWh = 1 PC, 1,000 kWh (1 MWh) = 1 kPC

² Based on 2021 bundled retail sales of 9,556,728 MWh less the 828,480 kPCs associated with PUCN-approved, bundled NGR sales.

³ The 685,186 kPC surplus total excludes 2021 surplus DSM credits which total 380,805 kPCs

Additional detail for 2021 and projected estimates for 2022 and the plan period of 2023 through 2025, including a breakdown by renewable facility, are provided in Appendix 5.2 of this report.

4.18 2021 Attestations

Since Sierra acquired kilowatt-hours from renewable energy systems that are not owned, operated or controlled by it to comply with its portfolio standard during 2021, NAC § 704.8879(4) requires Sierra to provide separate attestations from the owner or operator of the renewable energy system that the energy represented by those kilowatt-hours: (a) has not been and will not be sold or otherwise exchanged for compensation or used for credit in any other state or jurisdiction; and (b) has not been and will not be included within a blended energy product certified to include a fixed percentage of renewable energy in any other state or jurisdiction. These individual attestations and a summary table of the attestations are provided in Appendix 5.3.

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4.19 2021 Joint Pooling Arrangement between Sierra and Nevada Power

As approved by the Commission in Docket No. 08-04002, Nevada Power and Sierra created a joint pool of solar and non-solar PCs that consists of PCs contributed when either company exceeded its respective RPS obligations. Pursuant to the Pooling Agreement, these surplus PCs would be available to either utility if they were unable to meet their RPS obligations in a calendar year, provided that the utility repay to the lending utility’s account before the lending utility required the PCs for compliance. Nevada Power withdrew a total of 2,772,360 non-solar kPCs and 21,431 solar kPCs from the pool in 2007, 2008 and 2009. Nevada Power began repayment of its obligation to the pool in 2011 ending 2020 with an outstanding balance of 538,438 non-solar kPCs.¹⁷ Nevada Power repaid 538,438 kPCs in 2021. This will be the final reporting on the status of the joint credit pool. The balance is now zero, and both utilities have no immediate plans to setup a new pooling arrangement.

Table 4.13 Sierra Joint Pool Accounting

Sierra Credits in Pool	kPCs
<u>Non-Solar/Non-DSM Account Obligation</u>	
Non-Solar/ <u>Non-DSM</u> Credits Owed (kPC) ¹	(538,438)
Non-Solar/ <u>Non-DSM</u> Credits Repaid to Pool in 2021 (kPCs)	538,438
Ending Balance	0

Notes to Table 4-13:

¹ Reference Docket No. 21-04019, Table 4-11, for beginning balance due from Nevada Power

4.20 2021 DSM Contribution

The Commission’s Order in Docket No. 21-04019 authorized Sierra Pacific to carry forward 388,860 pre-2020 DSM kPCs. Calendar year 2020 yielded an additional 106,325.4 DSM derived kPCs, calendar year 2021 another 95,097.5 DSM derived kPCs (reference Appendix 5.6. for details). Collectively, these three totals will provide more than enough PCs to fill the 10 percent of credits from efficiency measures that is allowable to meet the current year’s RPS credit standard. DSM credits available for 2021 compliance that are excess of the ten percent limit will be banked and applied towards Sierra’s 2022 compliance.

In this filing, the company is requesting to discontinue the practice of delaying the certification and use of DSM from the previous calendar. The reason for this request is twofold. First, only credits from pre-2020 efficiency programs can qualify for certification. The various efficiency programs outlined in Appendix 5.6. have already been vetted, so there are no new programs to review. Second, actual retails sales for both 2020 and 2021 are known. Staff has the information

¹⁷ Reference Docket 19-04010, Table 4-11 for the 2018 ending pool balance

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needed to confirm the number of DSM derived credits generated during calendar year 2021 without having to delay the process until 2023.

Eliminating what amounts to a two-year delay in certification provides Sierra with the additional DSM credits its needs fully fund the maximum ten percent DSM RPS contribution through 2023. Although Sierra is still forecasted to fall short of the ten percent cap in 2024, the size of the shortfall would be significantly reduced. If we were to continue the practice of deferring certification by two years, the 2024 RECs would not be confirmed until 2026 which is one year past expiration.

DSM derived credits come from programs that were funded by Sierra's customers, and the objective is to extract the maximum benefit from the programs which includes the use of the derived credits. Any DSM shortfall would need to be filled with non-DSM credits. Non-DSM credits have a higher value. They don't have RPS use restrictions; they can be used towards green tariffs, and they can be marketed and sold to other parties with the proceeds benefiting Sierra's customers.

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5. Appendix

5.1 NEVADA POWER 2021 ACTUAL AND 2022-2025 OUTLOOK

	Actual	Projected ^a			
	2021	2022	2023	2024	2025
Nevada Power					
Bundled Retail Sales (MWhs)					
The PCs Associated with Optional Green Tariff Retail Sales	20,721,171	20,330,272	20,766,727	21,112,041	21,181,267
NGR Option 1 (Commercial & Residential) Green Tariff Sales	b. 0	(47,310)	(98,544)	(98,544)	(98,544)
Commission Approved NGR Option 2 & ESA Green Tariff Sales	b. (8,767)	(150,000)	(233,248)	(233,381)	(233,226)
Adjusted Retail Sales	20,712,404	20,132,962	20,434,935	20,780,116	20,849,497
RPS %	24%	29%	29%	34%	34%
Total RPS Credit Requirement	4,970,977	5,838,559	5,926,131	7,065,239	7,088,829
Maximum DSM Allowance, 10% 2020-2024	497,098	583,856	592,613	706,524	0
Geothermal					
Desert Peak 2, Net	92,286	98,972	94,281	90,528	90,528
Desert Peak 2, SU	30,538	10,048	9,597	9,882	9,597
Faulkner 1, Net	222,695	224,417	224,417	224,417	224,417
Faulkner 1, SU	101,900	34,702	34,702	34,702	34,702
Jersey Valley, Net	64,537	70,505	70,505	70,505	70,505
Jersey Valley, SU	39,960	14,529	14,529	14,529	14,529
McGinness Hills, Net	675,170	641,697	641,697	641,697	641,697
McGinness Hills, SU	147,655	110,692	110,692	110,692	110,692
Salt Wells, Net	62,175	71,919	71,919	71,919	71,919
Salt Wells, SU	30,671	21,238	21,238	21,238	21,238
Stillwater II, Net	122,449	121,154	120,315	126,525	126,525
Stillwater II, SU	50,878	33,063	33,063	33,063	33,063
Tuscarora, Net	133,908	127,397	127,397	127,397	127,397
Tuscarora, SU	60,979	24,271	24,271	24,271	24,271
Misc. Credit Purchases & Credits in lieu of Payment	0	0	0	0	0
2009 Ormat SPPC/NPC PC Transfer Agreement	c. 19,710	19,710	19,710	19,710	19,710
	1,855,510	1,624,314	1,618,333	1,621,074	1,620,790
Solar					
Nevada Solar One, Net	66,463	73,718	73,718	73,718	73,718
Nevada Solar One, SU	10,964	8,970	8,970	8,970	8,970
Tonopah Solar, Net Short-Term	75,345	176,890	176,890	140,290	0
Apex Solar, Net	50,661	51,876	51,876	51,876	51,876
Apex Solar, SU	203	200	200	200	200
Boulder Solar I	260,499	283,542	282,833	282,126	281,421
Boulder Solar III	0	0	0	381,570	376,974
Chuckwalla Solar	0	0	27,110	591,138	587,960
Copper Mountain 5	368,392	716,621	713,020	709,418	705,817
Dry Lake	0	0	0	435,436	431,596
Eagle Shadow Mountain Solar	d. 31,263	452,215	815,356	922,909	812,588
Gemini Solar (REC allocation 40% SPPC/60% NPC)	0	0	0	900,892	1,281,851
Hot Pot Solar (Energy/REC allocation 44% SPPC, 56% NPC)	0	0	0	23,314	531,471
Iron Point Solar (Energy/REC allocation 44% SPPC, 56% NPC)	0	0	16,402	378,166	376,078
Moapa (Arrow Canyon) Solar Energy/REC allocation 70% SPPC, 30% NPC	0	10,204	191,577	190,827	189,138
Mountain View Solar, Net	53,486	52,840	52,840	52,840	52,840
Mountain View Solar, SU	2,225	2,200	2,200	2,200	2,200
Nellis Solar II, Net	37,311	39,743	39,638	39,533	39,428
Nellis Solar II Multiplier Credits (1.4x)	52,235	55,640	55,493	55,346	55,199
Searchlight Solar, Net	47,456	47,509	47,509	47,509	47,509
Silver State Solar, Net	115,340	125,202	125,202	125,202	125,202
Silver State Solar, SU	2,633	2,633	2,633	2,633	2,633
Southern Bighorn Solar (60%)	0	0	171,707	635,896	632,562
Spectrum, Net	81,779	83,117	83,117	83,117	83,117
Spectrum, SU	314	314	314	314	314

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Table 5.1 Nevada Power Summary Table-Continued

Nevada Power	Actual	Projected ^a			
	2021	2022	2023	2024	2025
Stillwater 2 Solar, Net	37,560	35,263	36,102	29,892	29,892
Stillwater 2 Solar, SU	97,482	57,623	57,623	57,623	57,623
Techren Solar I	236,769	258,118	258,117	258,118	258,118
Techren Solar III	68,286	72,187	71,970	71,753	71,536
Techren Solar V	137,749	139,603	139,183	138,763	138,343
Nellis AFB Solar Star	48,060	68,387	68,045	67,705	67,366
PowerLight - LVWD	10,143	11,690	11,631	11,573	11,515
	1,892,620	2,826,304	3,581,277	6,770,866	7,385,054
Landfill Gas:					
CC Landfill Energy, Net	28,557	29,422	29,422	29,422	29,422
CC Landfill Energy, SU	7,573	7,570	7,570	7,570	7,570
Lockwood, Net	21,673	24,528	24,528	24,528	24,528
Lockwood, SU	825	1,217	1,217	1,217	1,217
	58,627	62,737	62,737	62,737	62,737
Waste Heat					
Goodsprings (NVE Owned), Net	29,185	27,365	27,365	27,365	27,365
Goodsprings (NVE Owned), SU	5,546	5,473	5,473	5,473	5,473
	34,731	32,838	32,838	32,838	32,838
Wind					
Spring Valley Project, Net	339,946	346,500	346,500	346,500	346,500
Spring Valley Project, SU	6,799	6,800	6,800	6,800	6,800
	346,745	353,300	353,300	353,300	353,300
Hydro					
Hoover	390,954	350,704	350,704	350,704	350,704
	390,954	350,704	350,704	350,704	350,704
NVE Owned Small (< .5 MW) Systems					
Solar - South	34	34	34	34	34
	34	34	34	34	34
Net Metered (Renewable Generations)					
Solar - South	640,168	637,795	634,606	631,433	628,276
Non-Solar - South	4	0	0	0	0
	640,172	637,795	634,606	631,433	628,276
Net Metered (Advanced Building Techniques)					
Solar - South	1,558	665	665	665	665
NON-DSM CREDIT SUMMARY					
Prior Year Carry Forward Credits	e. 1,301,042	1,273,683	1,458,754	2,331,735	5,455,261
Geothermal	1,855,510	1,624,314	1,618,333	1,621,074	1,620,790
Solar	1,892,620	2,826,304	3,581,277	6,770,866	7,385,054
Biomass/Methane	58,627	62,737	62,737	62,737	62,737
Hydro	390,954	350,704	350,704	350,704	350,704
Waste Heat Recovery	34,731	32,838	32,838	32,838	32,838
Wind	346,745	353,300	353,300	353,300	353,300
Net Metered (Renewables Generations) & ABT	641,765	638,494	635,305	632,132	628,975
Transferred to Joint Pool for the benefit of Sierra (Non-DSM)	f. (538,438)	0	0	0	0
Less Non-RPS Credit Commitments	g. (235,994)	(448,917)	(427,995)	(341,411)	(341,214)
Total Non-Solar, Non-DSM PCs	5,747,562	6,713,457	7,665,253	11,813,976	15,548,444

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Table 5.1 Nevada Power Summary Table-Continued

Nevada Power	Actual	Projected ^a			
	2021	2022	2023	2024	2025
DSM					
Prior Year Carry Forward	e. 4,467,073	5,214,620	5,178,551	5,080,123	4,773,791
DSM credits approved in current year for prior years	g. 1,244,645	547,788	494,185	400,192	0
Total DSM	5,711,718	5,762,407	5,672,736	5,480,315	4,773,791
DSM Cap	497,098	583,856	592,613	706,524	0
DSM Credits Applied Towards the Current Year RPS	497,098	583,856	592,613	706,524	0
Current Year DSM Surplus to be Carried Forward	5,214,620	5,178,551	5,080,123	4,773,791	4,773,791
COMPLIANCE SUMMARY					
CREDIT REQUIREMENT	4,970,977	5,838,559	5,926,131	7,065,239	7,088,829
OVERALL ELIGIBLE PCS					
Non-DSM	5,747,561	6,713,456	7,665,252	11,813,975	15,548,443
DSM	497,098	583,856	592,613	706,524	0
Total kPCs	6,244,659	7,297,312	8,257,865	12,520,499	15,548,443
NET SURPLUS / <Deficit>	1,273,682	1,458,753	2,331,734	5,455,260	8,459,614
Overall Surplus Credits:					
Non-DSM	1,273,682	1,458,753	2,331,734	5,455,260	8,459,614
DSM	5,214,620	5,178,551	5,080,123	4,773,791	4,773,791
Total Surplus Credits	6,488,301	6,637,304	7,411,857	10,229,050	13,233,404

- a. The 2022 to 2025 RPS credit requirement and credit supply forecasts are forward looking estimates. Retail sales are based on the 2021 Joint IRP base retail sales outlook. The actual credit requirement, credit supply, and the timing of new projects can vary. The above list excludes dedicated Nevada GreenRider Tariff projects where the 100% credits and other green attributes are assigned to the customer.
- b. The PCs associated with bundled retail sales under a Commission approved green tariff, NGR or ESA, whereby the portfolio energy credits are either transferred to or retired on behalf of a customer separately from the RPS. In 2019 Senate Bill 358 modified the RPS to exclude such sales in calculating the annual credit requirement. A revised NGR Option 1 tariff was approved by the Commission in Dockets 21-09018 (NPC) and 21-08019 (SPPC). The revised NGR Option tariff will be open to residential and non-residential customers of both utilities starting July 1, 2022.
- c. Per PUCN order 09-09018 (SPPC) and 09-08020 (NPC) credits from the expansion of certain Ormat facilities would be sold to NPC by SPPC based on a pre-negotiated schedule and price.
- d. Test energy (2021, 2022, and 2023 Q1). The company expects that the test energy produced by Eagle Shadow Mountain will be certified by WREGIS once the unit declares COD. Under the current WREGIS operating rules (Section 5.3.9), test energy up to 24 months prior to COD is eligible for certification provided that unit is approved by WREGIS within 75 days of the unit's COD.
- e. Authorized, pre-2021 credit balances rolled forwarded per PUCN order 21-04019 (1,301,042 non-demand-side kPCs and 4,467,073 demand-side management kPCs)
- f. The number of NPC non-DSM surplus credits repaid in 2021 to the joint credit pool and transferred to SPPC. The final repayment was made in 2021.
- g. kPCs transferred to 704B customers per the exit agreements.
- h. The exact number of 2022 DSM credits is the subject of a separate and later filing. Only 2020 and 2021 DSM credits will be applied against the current year's RPS credit requirement subject to all DSM credit limitations.

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5.2 SIERRA PACIFIC 2021 ACTUAL AND 2022-2025 OUTLOOK

	Actual	Projected ^{a.}			
	2021	2022	2023	2024	2025
Sierra Pacific Power					
Bundled Retail Sales (MWhs)	9,556,728	8,539,498	8,805,378	9,179,642	9,447,010
The PCs Associated with Optional Green Tariff Retail Sales					
NGR Option 1 (Commercial & Residential) Green Tariff Sales	b. (930)	(70,239)	(141,596)	(141,096)	(141,096)
Commission Approved NGR Option 2 & ESA Green Tariff Sales	b. (827,550)	(855,945)	(846,668)	(846,304)	(841,317)
Adjusted Retail Sales	8,728,248	7,613,314	7,817,114	8,192,242	8,464,597
RPS %	24%	29%	29%	34%	34%
RPS Credit Requirement	2,094,780	2,207,861	2,266,963	2,785,362	2,877,963
Maximum DSM Allowance 10% 2020-2024	209,478	220,786	226,696	198,150	
Geothermal					
Beowawe, Net	98,528	98,528	98,528	98,798	98,528
Beowawe, SU	21,782	8,322	8,322	8,345	8,322
Brady, Net	88,025	28,195	0	0	0
Galena 3, Net	100,195	110,128	110,128	110,429	110,128
Galena 3, SU	38,418	14,682	11,937	21,633	16,682
Richard Burdette, Net	116,318	125,309	125,309	125,653	125,309
Richard Burdette, SU	28,896	15,030	25,590	28,078	15,030
San Emidio (Amor 2), Net	88,901	80,846	80,846	81,067	80,846
San Emidio (Amor 2) SU	31,351	15,549	15,549	15,592	15,549
Steamboat II, Net	50,470	51,001	0	0	0
Steamboat III, Net	54,153	57,760	0	0	0
Misc. Credit Purchases & Credits in lue of Payment	259,013	0	0	0	0
2009 Ormat SPPC/NPC PC Transfer Agreement	(19,710)	(19,710)	(19,710)	(19,710)	(19,710)
	956,340	585,640	456,500	469,885	450,684
Solar					
Nevada Solar One, Net	31,281	34,207	34,207	34,301	34,207
Nevada Solar One, SU	5,183	4,221	4,220	4,232	4,220
Battle Mountain	135,704	292,861	291,063	290,622	287,423
Dodge Flat	0	547,862	566,570	565,268	561,965
Fish Springs Ranch	0	248,343	266,763	266,149	264,484
Gemini Solar (REC allocation 40% SPPC/60% NPC)	0	0	0	600,595	854,568
Hot Pot Solar (Energy/REC allocation 44% SPPC, 56% NPC)	0	0	0	18,368	417,585
Iron Point Solar (Energy/REC allocation 44% SPPC, 56% NPC)	0	0	12,888	297,944	295,490
Moapa (Arrow Canyon) Solar Energy/REC allocation 70% SPPC, 30% NPC	0	23,809	447,014	446,483	441,322
Southern Bighorn (Energy/REC allocation 40% SPPC, 60% NPC)	0	0	114,471	425,092	421,708
Techren Solar 1 (transferred from Nevada Power)	7,200	6,600	0	0	0
Techren Solar 4	67,694	72,187	71,970	71,949	71,536
Misc. Credit Purchases & Credit Transfers					
	247,062	1,230,090	1,809,166	3,021,004	3,654,508
Biomass/Biogas					
City of Sparks/TMWW (Credit Only)	7,763	7,616	7,616	7,247	0
	7,763	7,616	7,616	7,247	0
Hydro					
Fleish, Net	14,278	15,611	15,611	15,653	15,611
Verdi, Net	12,135	15,094	15,094	15,135	14,277
Washoe, Net	3,255	3,244	3,244	3,252	3,244
TCID New Lahontan, Net	8,050	13,204	13,204	13,240	6,837
	37,718	47,152	47,152	47,281	39,968
NVE Owned Small (< .5 MW) Systems					
Solar - North	4	4	4	4	4
Non-Solar - North	0	0	0	0	0
	4	4	4	4	4

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Table 5.2 Sierra Pacific Power Summary Table-Continued

Sierra Pacific Power	Actual	Projected ^a			
	2021	2022	2023	2024	2025
Net Metered (Renewable Generations)					
Solar - North	128,669	128,034	127,394	126,757	126,123
Non-Solar - North	443	443	443	443	443
	129,112	128,477	127,837	127,200	126,566
NON-DSM CREDIT SUMMARY					
Prior Year Surplus Carry Forward Credits	c. 693,006	685,186	593,029	771,894	1,606,226
Transferred to Credit Pool for the benefit of Sierra (Non-DSM)	d. 538,438	0	0	0	0
Geothermal	956,340	585,640	456,500	469,885	450,684
Solar	247,062	1,230,090	1,809,166	3,021,004	3,654,508
Biomass/Methane	7,763	7,616	7,616	7,247	0
Hydro	37,718	47,152	47,152	47,281	39,968
Net Metered (Renewables Generations)	129,116	128,481	127,841	127,204	126,570
Less Non-Solar, Non-RPS Credit Commitments & Credit Sales	e. (38,955)	(104,061)	(229,143)	(251,077)	(273,733)
Total Non-Solar PCs	2,570,488	2,580,104	2,812,161	4,193,438	5,604,224
DSM					
Prior Year Carry Forward	c. 388,860	380,805	242,480	127,161	0
DSM credits approved in current year for prior years	f. 201,423	82,461	111,377	70,988	0
Total DSM	590,283	463,266	353,858	198,150	0
The lower of the DSM Cap or the available balance	209,478	220,786	226,696	198,150	0
DSM Credits Applied Towards the Current Year RPS	209,478	220,786	226,696	198,150	0
Current Year DSM Surplus to be Carried Forward	380,805	242,480	127,161	0	0
COMPLIANCE SUMMARY:					
CREDIT REQUIREMENT	2,094,780	2,207,861	2,266,963	2,785,362	2,877,963
OVERALL ELIGIBLE PCS					
Non-DSM	2,570,488	2,580,104	2,812,161	4,193,438	5,604,224
DSM	209,478	220,786	226,696	198,150	0
Total kPCs	2,779,966	2,800,890	3,038,857	4,391,588	5,604,224
NET SURPLUS / <Deficit>	685,186	593,029	771,894	1,606,226	2,726,261
Overall Surplus Credits:					
Non-DSM	685,186	593,029	771,894	1,606,226	2,726,261
DSM	380,805	242,480	127,161	0	0
Total Surplus Credits	1,065,991	835,509	899,056	1,606,226	2,726,261
Net kPCs Carried Forward	1,065,991	835,509	899,056	1,606,226	2,726,261

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Table 5.2 Sierra Pacific Power Summary Table-Continue Table 5.2

- The 2021 to 2024 RPS credit requirement and credit supply forecasts are forward looking estimates. Retail sales are based on 2021 Joint IRP base retail sales outlook. The actual credit requirement, credit supply, and the timing of new projects can vary. The above list excludes customer-dedicated Nevada GreenRider Tariff projects where the credits and other renewable attributes are fully assigned to the customer. In the case of Sierra, such agreements include Boulder Solar 2, Fort Churchill Solar Array, Techren II Solar, and Turquoise Nevada Solar.
- a.
- The PCs associated with bundled retail sales under a Commission approved green tariff, NGR or ESA, whereby the portfolio energy credits are either transferred to or retired on behalf of a customer separately from the RPS. In 2019 Senate Bill 358 modified the RPS to exclude such sales in calculating the annual credit requirement. A revised NGR Option 1 tariff was approved by the Commission in Dockets 21-09018 (NPC) and 21-08019 (SPPC). The revised NGR Option tariff will be open to residential and non-residential customers of both utilities starting July 1, 2022.
- b.
- c. Authorized, pre-2021 credit balances rolled forwarded per PUCN order 21-04019 (693,007 non-demand-side kPCs and 388,860 demand-side management kPCs).
- d. The number of NPC non-DSM surplus credits repaid in 2020 or to be repaid in 2021 to the joint credit pool and transferred to SPPC.
- e. Non-solar and solar kPCs transferred to 704B customers per the exit agreements, station usage credits transferred to NPC per PUCN order 09-09018, credits retired separately from the RPS for NGR Option 1 customers.
- f. The exact number of 2022 DSM credits is the subject of a separate and later filing. Only 2020 and 2021 DSM credits will be applied against the current year's RPS credit requirement subject to all DSM credit limitations.

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5.3 2021 ATTESTATIONS

2021 Summary of Requests for Attestation Letters

Nevada Power & Sierra Pacific Power Purchase Power Agreements

Owner	Facilities	Attestation Returned?
ACE Searchlight Solar, LLC c/o D.E. Shaw Renewable Investments, LLC	Searchlight Solar	Yes
Acciona Energy North America	Nevada Solar One	Yes
Nexterra Energy Resources, LLC	Mountain View Solar	Yes
City of Sparks - TMWRF	Truckee Meadows Waste Water Facility	Yes
Spring Valley Wind LLC c/o Pattern Energy Group LP	Spring Valley Wind	Yes
SunPower Corporation, Systems	Fort Apache, Grand Canyon, Luce, Ronzone, Spring Mountain & Spring Preserve	Yes
Terra-Gen Power, LLC (now Ormat)	Beowawe Power LLC	Yes
Solar Star Management Terraform Power	Solar Star, NAFB	Yes
Ormat Nevada, Inc	Brady, Desert Peak 2, Galena 3, Jersey Valley, McGinness Hills 1 & 2, Richard Burdette, Steamboats 2 & 3, Tuscarora, & San Emidio	Yes
Truckee Meadows Water Authority	Washoe, Verdi, & Fleish	Yes
Truckee Carson Irrigation District	New Lahontan	Yes
NGP Blue Mountain I LLC	NGP Blue Mountain I LLC	Yes
Enel Stillwater, LLC & Enel Salt Wells, LLC	Salt Wells, Stillwater Geothermal & Stillwater PV	Yes
Enbridge Energy Company Inc.	Silver State Solar Power North, LLC	Yes
Republic Services Renewable Energy, LLC	Apex LF Renewable Energy Generating Facility (CC Landfill)	Yes
WM Nevada Renewable Energy, LLC	WMNRE - Lockwood	Yes
Southern Power Company	RV Apex Solar, FRV Spectrum, Boulder Solar I	Yes
EDF Renewable Energy, Inc.	Switch Station 1, Switch Station 2 (the credits generated from these facilities are dedicated to Switch, Inc. under an NV GreenEnergy Rider Agreement)	Yes
Clenera Renewable Energy	Techren Solar 1, 2, 3, 4 & 5	Yes
Colorado River Commission	Nevada Power's 2020 share of Hoover's Net Generation	Yes
Turquoise Nevada LLC c/o Greenbacker Renewable Energy Corp.	Turquoise Nevada	Yes
American Electrical Power	Boulder Solar II	Yes
Copper Mountain Solar 5, LLC / Consolidated Edison, Inc.	Copper Mountain 5	Yes
Battle Mountain SP, LLC / Consolidated Edison Development, Inc.	Battle Mountain	Yes
Arevon Energy, Inc.	Eagle Shadow Mountain	Yes
Tonopah Solar Energy	Tonopah Crescent Dunes Solar	Yes



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company¹:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Searchlight Solar

A handwritten signature in black ink, appearing to read "Chris Clevenger", written over a horizontal line.

Signature

Chris Clevenger

Name

American Capital Energy – Searchlight Solar, LLC

Company Name

¹ Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company²:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Nevada Solar One

A handwritten signature in black ink that reads "Olivia Giacomelli".

Signature

Olivia Giacomelli

Name

Nevada Solar One

Company Name

² Requirement is per NAC § 704.8879(4), Annual Reports




2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company³:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Mountain View Solar



Signature

Emily Kent

Name

Mountain View Solar, LLC

Company Name

³ Requirement is per NAC § 704.8879(4), Annual Reports

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2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company⁴:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Truckee Meadows Waste Water Facility

A handwritten signature in black ink, appearing to read "Michael A. Drinkwater", written over a horizontal line.

Signature

Michael A. DRINKWATER - Treatment Plant Manager

Name

CITY of Sparks, NV

Company Name

⁴ Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Spring Valley Wind

A handwritten signature in black ink that reads "Rita Brady".

2021.12.09 16:01:51
-06'00'

Signature

Rita Brady

Name

Spring Valley Wind LLC

Company Name

⁵ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021



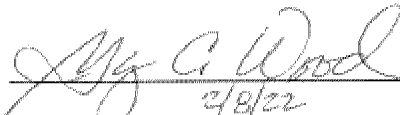
2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company⁶:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Fort Apache, Grand Canyon, Luce, Ronzone, Spring Mountain & Spring Preserve


Signature *2/8/22*

GARY A. WOOD, P.E., RENEWABLE ENERGY PROGRAM MANAGER

Name

LAS VEGAS VALLEY WATER DISTRICT

Company Name

⁶ Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

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- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Beowawe Power LLC

A handwritten signature in cursive script that reads "Jeannie Hudson".

Signature

Jeannie Hudson

Name

Beowawe Power LLC

Company Name

⁷ Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company⁸:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Solar Star, NAFB

A handwritten signature in black ink, appearing to read "Megha Shah".

Signature

Megha Shah, Vice President

Name

Solar Star NAFB, LLC

Company Name



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company⁹:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and
- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Brady, Desert Peak 2, Galena 3, Jersey Valley, McGinness Hills 1 & 2, Richard Burdette, Steamboats 2 & 3, Tuscarora, & San Emidio

A handwritten signature in cursive script that reads "Jeannie Hudson".

Signature

Jeannie Hudson

Name

Ormat Nevada Inc.

Company Name

⁹ Requirement is per NAC § 704.8879(4), Annual Reports

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Portfolio Standard Annual Report, Compliance Year 2021



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company¹⁰:

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Facility (s):

Washoe, Verdi, & Fleish

A handwritten signature in black ink, appearing to read "Brent Eisert", written over a horizontal line.

Signature

A handwritten name in black ink, "Brent Eisert - Mgr. TMWA Hydroelectric Production", written over a horizontal line.

Name

A handwritten company name in black ink, "Truckee Meadows Water Authority", written over a horizontal line.

Company Name

¹⁰ Requirement is per NAC § 704.8879(4), Annual Reports

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Portfolio Standard Annual Report, Compliance Year 2021



2021 Annual Renewable Energy Portfolio Credit Attestation Request

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

New Lahontan


Signature


Name


Company Name

¹¹ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company¹²:

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

NGP Blue Mountain I LLC

A handwritten signature in cursive script that reads "Larry Allen".

Signature

Larry Allen

Name

Cyrq Energy - NGP Blue Mountain I LLC

Company Name

¹² Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Salt Wells, Stillwater Geothermal & Stillwater PV

Piero Guerritore

Signed by Piero Guerritore

Signature

Piero Guerritore

Name

Enel Stillwater, LLC & Enel Salt Wells, LLC

Company Name

¹³ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
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2021 Annual Renewable Energy Portfolio Credit Attestation Request

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Silver State Solar Power North, LLC

John Durels

Digitally signed by John Durels
Date: 2022.02.01 07:42:47
-08'00'

Signature

John Durels

Name

Enbridge

Company Name

¹⁴ Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company¹⁵:

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Apex LF Renewable Energy Generating Facility (CC Landfill)

David Vosmmer

Signature

David Vosmmer

Name

Republic Services Renewable Energy LLC.

Company Name

1-6-22

¹⁵ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

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2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company¹⁶:

- a.) Has not been and will not be sold or otherwise exchanged for compensation or used in any other state or jurisdiction; and

- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

WMNRE - Lockwood

DocuSigned by:
Randy Beck
EE246F743076889

Signature

Randy Beck

Name

WM Nevada Renewable Energy, L.L.C.

Company Name

¹⁶ Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

The renewable energy and associated portfolio energy credits produced at the facility(s) listed below in calendar year 2021 and transfer to Sierra Pacific Power Company/Nevada Power Company¹⁷:

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Facility (s):

RV Apex Solar, FRV Spectrum, Boulder Solar I

Thomas E. Schmaeling

Signature

Thomas E. Schmaeling

Name

Southern Power Company

Company Name

¹⁷ Requirement is per NAC § 704.8879(4), Annual Reports



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Facility (s):

Switch Station 1, Switch Station 2 (the credits generated from these facilities are dedicated to Switch, Inc. under an NV GreenEnergy Rider Agreement)

Michael Brady

Signature

Michael Brady

Name

EDF Renewables Asset Holdings

Company Name

¹⁸ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

DocuSign Envelope ID: C3D6E3FE-630C-4070-A699-16624BF01BF7



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Facility (s):	Techren Solar I LLC
	Techren Solar II LLC
	Techren Solar III LLC
Techren Solar 1, 2, 3, 4 & 5	Techren Solar IV LLC
	Techren Solar V LLC

DocuSigned by:
Samuel Menco
D8E7FD14969A4D4...

Signature

Samuel Menco, Authorized Signatory

Name

Global Atlantic Financial Company

Company Name

¹⁹ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021



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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Nevada Power's allocated share of Hoover's Net Generation and renewable energy credits from calendar year 2021

Gail A Bates

Signature

Gail A Bates, Assistant Dir Hydropower

Name

Colorado River Commission of NV 12/7/2021

Company Name

²⁰ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s):

Turquoise Nevada

DocuSigned by:
Richard Butt
482FAFC00338CACS..

Signature

Richard Butt, Chief Financial Officer

Name

Turquoise Nevada LLC

By: Turquoise Holdings LLC, its Manager

Company Name

²¹ Requirement is per NAC § 704.8879(4), Annual Reports



2021 Annual Renewable Energy Portfolio Credit Attestation Request

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Facility (s):

Boulder Solar II

DocuSigned by:
Cody Boebel
0288A5A9017B42F

Signature

Cody Boebel

Name

AEP Renewables

Company Name

²² Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
Portfolio Standard Annual Report, Compliance Year 2021

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- b.) Has not been and will not be included within a blended product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

Facility (s): Copper Mountain 5

DocuSigned by:
kimberly pisaneschi
101629EF0DFF425

Signature

Kimberly Pisaneschi

Name

Copper Mountain Solar 5, LLC

Company Name

²³ Requirement is per NAC § 704.8879(4), Annual Reports



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Facility (s):

Battle Mountain Solar

Sharon Amorette
Signature

Sharon Amorette
Name

Battle Mountain SP, LLC
Company Name

¹ Requirement is per NAC § 704.8879(4), Annual Reports

NV Energy
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Facility (s):

Eagle Shadow Mountain

Note: Test Energy in 2021 only

Anand Narayanan

Signature

Anand Narayanan

Name

Arevon Energy, Inc.

Company Name

Signature: 

Email: anarayanan@arevonenergy.com

¹ Requirement is per NAC § 704.8879(4), Annual Reports
P.O. Box 98910, Pearson, 3rd Floor, MS 29, Las Vegas, NV 89151-0001



2021 Annual Renewable Energy Portfolio Credit Attestation Request

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Facility (s):

Tonopah Crescent Dunes Solar

A handwritten signature in black ink, appearing to read "Oscar Yunta Toledo", written over a horizontal line.

Signature

Oscar Yunta Toledo, Treasurer

Name

Tonopah Solar Energy, LLC

Company Name

¹ Requirement is per NAC § 704.887(4), Annual Reports
P.O. Box 98910, Pearson, 3rd Floor, M5 29, Las Vegas, NV 89151-0001

NV Energy
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5.4 2021 SIERRA GREENENERGY RIDER OPTION 1 CUSTOMERS BY TYPE

Customer Type	Customer Count 12/31/2021	NGR Option 1 Count as of 12/31/21	2021 NGR Option 1 kW Hrs	2021 NGR Option 1 Revenue
Residential				
D-1	4			
DM-1	1			
OD-1-TOU	1			
D-1-NMRG	9			
D-1	55			
OD-1 TOU	8			
OD-1 TOU HEV	8			
DM-1	1			
D-1 AB405 T2	44			
D-1 AB405 T3	30			
D-1 AB405 T4	73			
OD-1 TOU AB405 T2	15			
OD-1 TOU AB405 T3	49			
OD-1 TOU AB405 T4	10			
OD-1 TOU HEV AB405 T2	7			
OD-1 TOU HEV AB405 T3	11			
OD-1 TOU HEV AB405 T4	10			
D-1 Domestic Use	229,472	63	432,456	6,096
DM-1 Domestic Multi-Family	80,031	26	146,261	2,051
OD-1-TOU Optional Domestic Ser	745	1	5,151	71
ODM-1-TOU Op Dom MF-TOU	36			
OD-1-TOU-HEV (Hybrid Vehicle)	587	7	85,060	1,229
ODM-1-REVR-TOU	36			
D-1-NMRG	2,352			
OD-1-TOU-NMRG	24			
D-1-TOU-EVRR-NMRG	29			
DM-1-NMRG	3			
D-1-Flexpay	1,914			
DM-1-Flexpay	1,082			
D-1	627			
OD-1 TOU	12			
OD-1 TOU HEV	14			
DM-1	27			
D1_CPP+DDP	1			
D-1 AB405 T2	483			
D-1 AB405 T3	398			
D-1 AB405 T4	942			
OD-1 TOU AB405 T2	4			
OD-1 TOU AB405 T3	7			
OD-1 TOU AB405 T4	18			
OD-1 TOU HEV AB405 T2	8			
OD-1 TOU HEV AB405 T3	13			
OD-1 TOU HEV AB405 T4	19			
DM-1 AB405 T2	3			
DM-1 AB405 T4	3			
Total Residential	319,226	97	668,928	9,446

NV Energy
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SIERRA GREENENERGY RIDER OPTION 1 (CONTINUED)

Commercial & Industrial - Small

GS-1 Small General Service	41,737			
OGS-1-TOU Optional General - T	1,670			
SSR 2 Sm Standby (GS-1)	4			
WP Water Plumbing	1			
IS-1 Irrigation Service	654			
IS-2 Interruptible Irrigation	765			
WCS-1-Wireless Comm - Level 1	1			
OGS-1-TOU-HEV (Hybrid Vehicle)	9			
GS-2S Med Gen Serv-Secondary	3,312	1	260,442	3,738
GS-2P Med Gen Serv-Primary	36			
GS-2T Med Gen Serv-Transmissio	8			
GS-2S-TOU Med Gen Serv-TOU-S	123			
GS-2P-TOU Med Gen Serv-TOU-P	10			
GS-2T-TOU Med Gen Serv-TOU-T	5			
SSR-3P Sm Standby (GS-2P)	1			
SSR-3T Sm Standby (GS-2T)	5			
OGS-2S-TOU Optional Med Gen-S	642			
LSR-1T Med Standby(GS-2-TOU-T)	5			
GS-1	12			
GS-1-NMRG	178			
OGS-1-TOU-NMRG	1			
GS-1-AB405 T2	3			
GS-1-AB405 T3	4			
GS-1-AB405 T4	1			
OGS-2S TOU EVCCR	18			
GS-2S TOU EVCCR	1			
Subtotal Bundled:	49,206	1	260,442	3,738
DO-GS-1 Sm General Service	2			
DO-GS-2S Med Gen Serv-Secondar	2			
DO-GS-2S-TOU Med Gen Ser-TOU-S	4			
Subtotal DOS:	8	-	-	-
Commercial & Industrial - Small Total:	49,214	1	260,442	3,738

Commercial & Industrial - Large

GS-4 Large Transmission Servic	1			
GS-4T-NG-New Gen GS-4-Transmis	3			
GS-3P-NG-New Gen GS-3-Primary	1			
GS-3T-NG-New Gen GS-3-Transmis	(1)			
GS-3S Large General Service-S	38			
GS-3P Large General Service-P	34			
GS-3T Large General Service-T	19			
LSR-2P Lg Standby Serv(GS-3-P)	1			
LSR-2T Lg Standby Serv(GS-3-T)	14			
Subtotal Bundled:	110	-	-	-

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SIERRA GREENENERGY RIDER OPTION 1 (CONTINUED)

DO-GS-4 Large Transmission	3			
DO-GS-3S Large General Serv-S	5			
DO-GS-3P Large General Serv-P	-			
DO-GS-3T Large General Serv-T	1			
<hr/>				
Subtotal DOS:	9	-	-	-
Commercial & Industrial - Large Total	119	-	-	-
Public Street & Hwy. Lights				
SL Street Lighting	111	-	-	-
Bundled Total	368,653	98	929,370	\$13,184
DOS Total	17	-	-	-
<hr/>				
Grand Total	368,670	98	929,370	\$13,184
<hr/>				

**NV Energy
Portfolio Standard Annual Report, Compliance Year 2021**

5.5 2021 DSM CREDIT CALCULATIONS

NPC 2020

DSM Programs	2005 Full Annual Savings kWh	2006 Full Annual Savings kWh	2007 Full Annual Savings kWh	2008 Full Annual Savings kWh	2009 Full Annual Savings kWh	2010 Full Annual Savings kWh	2011 Full Annual Savings kWh	2012 Full Annual Savings kWh	2013 Full Annual Savings kWh	2014 Full Annual Savings kWh	2015 Full Annual Savings kWh	2016 Full Annual Savings kWh	2017 Full Annual Savings kWh	2018 Full Year Savings kWh	2019 Full Annual Savings kWh	Total Savings kWh	% kWh On-Peak for Annual kWh Savings	
Residential																		
Advance Equip. Tech.	0	0	0	0	0	0	365,047	501,247	0	0	0	0	0	0	0	866,304	8.80%	
Consumer Electronics/80 Plus	0	0	0	0	0	0	9,849,665	5,937,031	0	0	0	0	0	0	0	15,786,696	9.57%	
Direct Response	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	34,140%	
Drum Install	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7,900%	
Energy Assessments In Home	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18,380%	
OnSite Energy Assessments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18,380%	
Energy Education N.E.S.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7.81%	
EnergyStar Lighting	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7.68%	
Energy Smart HomePlus	13,400,810	32,563,206	0	1,532,258	2,041,407	4,054,597	3,926,034	4,018,236	0	0	0	0	0	0	0	15,573,532	8.80%	
High Efficiency AC	0	0	0	0	0	0	4,379,734	6,850,111	9,573,484	10,445,621	5,017,447	12,495,850	10,937,337	97,977	2,932,478	108,594,175	26.99%	
Home Energy Reports	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18.39%	
HomeFree Nevada	0	0	0	0	0	0	35,796	0	0	0	0	0	0	0	0	0	19.39%	
Low Income	0	0	0	243,934	3,327,228	1,019,737	347,030	0	0	0	0	0	0	0	0	35,796	19.39%	
Energy Smart Manufactured Homes	0	0	0	0	0	0	649,036	0	0	0	0	0	0	0	0	0	8.28%	
Pool Pumps	0	0	0	0	0	0	5,967,128	5,739,104	8,598,006	10,196,676	11,125,100	0	0	0	0	4,937,948	9.21%	
Refrigerator Recycling	0	0	0	0	0	0	1,257,965	0	0	0	0	0	0	0	0	0	649,036	9.21%
Solar Thermal Water Heaters	0	0	0	0	0	0	0	2,544,311	4,761,860	5,054,423	4,782,300	0	0	0	0	17,142,894	9.80%	
Solar Thermal Water Heaters	0	0	0	0	0	0	63,814	20,530	34,242	7,189	4,438	0	0	0	0	132,213	4.60%	
Residential Total	13,400,810	32,563,206	0	1,777,192	5,368,635	6,981,355	24,936,248	25,610,580	22,967,592	35,354,517	38,059,646	12,495,850	11,000,855	4,059,476	36,065,068	270,644,029	17.84%	
Commercial																		
Business Energy Services/Non-Profit	0	0	0	0	0	108,409,536	100,067,301	89,951,467	94,699,185	105,561,343	109,505,228	102,563,663	135,176,397	121,922,459	145,574,065	1,113,430,684	9.96%	
704B Recapture - Wynn	0	0	0	0	0	0	(1,672,236)	(856,804)	(6,902,664)	(6,020,448)	(3,388,504)	0	0	0	0	(20,440,656)	0	
704B Recapture - MGM	0	0	0	0	0	0	(16,219,140)	(17,697,180)	(14,259,480)	(16,021,284)	(15,464,052)	0	0	0	0	(79,666,136)	0	
704B Recapture - Caesars South	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
704B Recapture - SLS Las Vegas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
704B Recapture - Georgia-Pacific	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Net Commercial Incentives	0	0	0	0	0	108,409,536	82,175,925	69,991,840	73,410,599	79,144,554	84,572,698	66,799,492	135,176,397	121,922,459	145,574,065	967,177,585	9.96%	
Business Energy Reports	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Commercial Construction	0	0	0	25,723,138	59,394,066	24,440,406	7,526,035	14,280,537	0	0	0	0	0	0	0	3,832,790	21.76%	
Commercial Demand Response	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Consumer Electronics/80 Plus	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Energy Efficient Schools	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
HomeMeters	0	0	880,672	5,756,119	5,309,723	2,380,697	21,481,483	8,007,189	11,246,004	8,790,183	9,298,071	13,852,233	12,542,063	7,653,501	7,738,795	115,019,039	12.00%	
None-Prof Credits	0	0	0	4,706,972	0	0	0	0	0	0	0	0	0	0	0	4,706,972	20.43%	
None-Prof Credits	0	0	0	406,189	169,295	324,539	252,783	333,332	650,002	612,292	877,421	0	0	0	0	3,627,873	9.32%	
Commercial Total	0	880,672	56,598,718	64,873,093	135,555,218	111,556,226	92,680,661	85,306,605	88,547,029	94,484,190	80,651,725	147,718,458	129,557,960	157,145,650	1,225,790,206	10.31%		
Line loss multiplier	1.05																	
On peak multiplier	2.00																	
Residential																	334,862,191	
Commercial																	313,474,373	
Total DSM																	648,336,564	
Portfolio Energy Credits for 2020																	648,336,564	

Notes for Table:
 Total IPCC Chained From Energy Efficiency Measures are calculated such that 50% of Total Savings (kWh) included come from residential sources. See NRS 704.7821.
 Annual Savings from NEX reports filed in the following dockets:
 2005 Savings - Docket No. 06-06051
 2006 Savings - Docket No. 07-08016
 2007 Savings - Docket No. 08-08011
 2008 Savings - Docket No. 09-08017
 2009 Savings - Docket No. 10-10024
 2010 Savings - Combined Docket Nos. 12-03004, 12-03005 and 12-03006
 2011 Savings - Combined Docket Nos. 12-06052, 12-06053 and 12-08009
 2012 Savings - Combined Docket Nos. 13-07002, 12-06053 and 13-07005
 2013 Savings - Combined Docket Nos. 14-07007 and 14-07008
 2014 Savings - Combined Docket Nos. 15-06065 and 15-07004
 2015 Savings - Combined Docket Nos. 16-07001 and 16-07007
 2016 Savings - Combined Docket Nos. 17-06043 and 17-06044
 2017 Savings - Docket No. 18-06003
 2018 Savings - Docket No. 19-07003
 2019 Savings - Docket No. 20-07004
 2020 Savings - No additional savings are authorized from DSM programs

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SPPC 2020

DSM Programs	2006 Full Annual Savings kWh	2007 Full Annual Savings kWh	2008 Full Annual Savings kWh	2009 Full Annual Savings kWh	2010 Full Annual Savings kWh	2011 Full Annual Savings kWh	2012 Full Annual Savings kWh	2013 Full Annual Savings kWh	2014 Full Annual Savings kWh	2015 Full Year Savings kWh	2016 Full Year Savings kWh	2017 Full Year Savings kWh	2018 Full Year Savings kWh	2019 Full Year Savings kWh	Total Savings kWh	% kWh Or Peak for Annual kWh Savings
Residential																
Consumer Electronics80 Plus	0	0	0	0	0	3,278,690	2,088,216	0	0	0	0	0	0	0	5,366,906	26.59%
Demand Response	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27,999%
Direct Install	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Energy Assessments in Home	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Energy Assessments online	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Energy Education Kits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EnergySmart Manufactured Homes	0	0	228,000	9,792	69,180	80,189	0	0	0	0	0	0	0	0	0	0
EnergyStar Lighting	0	0	0	0	0	0	0	0	2,319,792	6,632,905	6,441,578	0	0	10,711,606	387,161	23.44%
Home Energy Reports	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Low Income	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Refrigerator Recycling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Solar Thermal Water Heaters	0	0	0	0	0	42,338	29,666	1,859,872	2,467,100	2,545,844	0	0	0	0	7,925,821	16.85%
Residential Total	0	0	228,000	9,792	69,180	3,401,237	3,170,887	1,918,540	4,802,002	9,232,999	6,441,578	0	676,621	12,396,348	42,347,183	22.54%
Commercial																
Business Energy Services/Non-Profit Grants	0	0	0	0	30,316,481	30,326,756	23,031,818	21,737,690	37,464,750	28,645,212	42,809,439	50,803,353	51,103,276	68,524,769	384,763,544	16.95%
704B Recapture - Caesars North	0	0	0	0	0	0	0	(74,037)	(9,553)	(147,136)	(117,949)	0	0	0	(463,873)	0
704B Recapture - Peppermill	0	0	0	0	0	0	0	(270,123)	(82,689)	0	0	0	0	0	(352,812)	0
Net Commercial Incentives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	383,946,854	16.95%
Business Energy Reports	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial Construction	0	0	0	0	0	6,974,009	1,691,813	4,563,197	5,246,686	11,861,041	0	0	0	0	472,688	17.79%
Commercial Demand Response	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Consumer Electronics80 Plus	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EnergySmart Schools	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hotel/Motels	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Profit Grants	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049	112,049
Commercial Total	112,049	112,049	112,049	112,049	112,049	14,492,457	8,791,323	14,293,904	1,955,812	1,797,171	1,730,824	3,253,549	6,056,818	6,136,927	464,998,253	16.58%
Line loss multiplier	1.05															
On peak multiplier	2.00															
Portfolio Energy Credits																
Residential																54,487,215
Commercial																51,938,247
Total DSM Portfolio Energy Credits for 2020																106,325,462

Notes for Table:
 Total PCs Claimed From Energy Efficiency Measures are calculated such that 50% of Total Savings (in kWh) included come from residential sources. See NRS 704.7821.
 Annual Savings from M&V reports filed in the following dockets:
 2006 Savings - Docket No. 07-06049
 2007 Savings - Docket No. 08-08012
 2008 Savings - Docket No. 09-08017
 2009 Savings - Docket No. 10-10024
 2010 Savings - Combined Docket Nos. 12-03004, 12-03005 and 12-03006
 2011 Savings - Combined Docket Nos. 12-06052, 12-06053 and 12-08009
 2012 Savings - Combined Docket Nos. 13-07002, 12-06053 and 13-07005
 2013 Savings - Combined Docket Nos. 14-07007 and 14-07008
 2014 Savings - Combined Docket Nos. 15-06065 and 15-07004
 2015 Savings - Combined Docket Nos. 16-07001 and 16-07007
 2016 Savings - Combined Docket Nos. 17-06043 and 17-06044
 2017 Savings - Docket No. 18-06003
 2018 Savings - Docket No. 19-07003
 2019 Savings - Docket No. 20-07004
 2020 Savings - No additional savings are authorized from DSM programs

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SPPC 2021

DSM Programs	2006 Full Annual Savings kWh	2007 Full Annual Savings kWh	2008 Full Annual Savings kWh	2009 Full Annual Savings kWh	2010 Full Annual Savings kWh	2011 Full Annual Savings kWh	2012 Full Annual Savings kWh	2013 Full Annual Savings kWh	2014 Full Annual Savings kWh	2015 Full Annual Savings kWh	2016 Full Annual Savings kWh	2017 Full Annual Savings kWh	2018 Full Annual Savings kWh	2019 Full Annual Savings kWh	Total Savings kWh	% kWh On-Peak for Annual kWh Savings
Residential																
Consumer Electronics/80 Plus	0	0	0	0	0	1,366,121	2,088,216	0	0	0	0	0	0	0	3,451,337	26.59%
Demand Response	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27.99%
Direct Install	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24.04%
Energy Assessments in-home	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	22.87%
Energy Assessments on-site	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	22.87%
Energy Education/Kits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19.82%
Energy Smart Manufactured Homes	0	0	228,000	9,792	69,180	80,189	0	0	0	0	0	0	0	0	387,161	23.44%
Energy/Star Lighting	0	0	0	0	0	0	0	0	2,319,792	6,632,905	6,441,578	0	0	10,711,606	26,105,881	24.18%
Home Energy Reports	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	22.87%
Low Income	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	21.34%
Refrigerator Recycling	0	0	0	0	0	0	0	929,936	2,467,100	2,545,844	0	0	0	0	5,942,880	16.85%
Solar Thermal Water Heaters	0	0	0	0	0	42,358	29,666	58,668	15,110	51,250	0	0	0	0	200,052	21.97%
Residential Total	0	0	228,000	9,792	69,180	1,498,608	2,117,882	988,604	4,802,002	9,232,999	6,441,578	0	0	369,833	12,112,334	22.63%
Commercial																
Business Energy Services/Non-Profit Grants	0	0	0	0	30,316,481	30,326,756	23,031,818	21,237,690	37,464,750	28,645,212	42,809,439	50,803,353	51,103,276	68,524,769	384,763,544	16.98%
704B Recapture - Ciesans North	0	0	0	0	0	0	(115,202)	(74,037)	(9,553)	(147,136)	(117,949)	0	0	0	(463,878)	
704B Recapture - Peppercorn	0	0	0	0	0	0	(270,123)	(82,689)	(82,689)	0	0	0	0	0	(352,812)	
Net Commercial Incentives	0	0	0	0	30,316,481	30,326,756	22,916,616	21,393,530	37,372,507	28,498,076	42,691,490	50,803,353	51,103,276	68,524,769	383,946,854	16.95%
Business Energy Reports	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17.79%
Commercial Construction	0	0	4,867,585	6,974,009	1,691,813	4,563,197	5,246,686	11,861,041	0	0	0	0	0	0	35,204,331	15.94%
Commercial Demand Response	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	42.57%
Consumer Electronics/80 Plus	0	0	0	0	0	98,103	45,830	0	0	0	0	0	0	0	143,933	26.64%
Energy Smart Schools	0	0	3,264,958	3,052,071	1,870,398	1,153,881	1,413,735	2,214,482	1,588,536	1,074,472	1,730,824	3,253,549	6,056,818	5,664,239	32,337,963	11.73%
Hotels/Motels	0	0	3,535,188	3,043,865	0	0	0	0	0	0	0	0	0	0	6,579,053	22.70%
Non-Profit Grants	112,049	130,715	258,172	407,891	585,604	230,035	103,843	218,381	367,276	722,699	0	0	0	0	3,138,665	16.27%
Commercial Total	112,049	130,715	11,925,903	13,477,836	34,464,296	36,571,972	29,728,710	35,687,434	39,328,319	30,255,247	44,422,314	54,056,902	57,160,094	74,189,008	461,350,799	16.59%
Line loss multiplier																
																1.06
On peak multiplier																2.00

Notes for Table:

Total PCs Claimed From Energy Efficiency Measures are calculated such that 50% of Total Savings (in kWh) included come from residential sources. See NRS 704.7821.

Annual Savings from M&V reports filed in the following dockets:

- 2006 Savings - Docket No. 07-06049
- 2007 Savings - Docket No. 08-08012
- 2008 Savings - Docket No. 09-08017
- 2009 Savings - Docket No. 10-10024
- 2010 Savings - Combined Docket Nos. 12-03004, 12-03005 and 12-03006
- 2011 Savings - Combined Docket Nos. 12-06052, 12-06053 and 12-08009
- 2012 Savings - Combined Docket Nos. 13-07002, 12-06053 and 13-07005

- 2013 Savings - Combined Docket Nos. 14-07007 and 14-07008
- 2014 Savings - Combined Docket Nos. 15-06065 and 15-07004
- 2015 Savings - Combined Docket Nos. 16-07001 and 16-07007
- 2016 Savings - Combined Docket Nos. 17-06043 and 17-06044
- 2017 Savings - Docket No. 18-06003
- 2018 Savings - Docket No. 19-07003
- 2019 Savings - Docket No. 20-07004
- 2020 Savings - No additional savings are authorized from DSM programs

Portfolio Energy Credits

Residential 48,749,894

Commercial 46,347,694

Total DSM Portfolio Energy 95,097,589

Credits for 2021

5.6 2021 REVERSE RFP OFFER

Reverse Request for Proposal for Renewable Energy Credits (“RFP”)

September 13, 2021

Sierra Pacific Power Company, a Nevada corporation doing business as NV Energy (“Sierra Pacific”), is soliciting proposals to sell unbundled Renewable Energy Credits (“RECs”), also referred to in Nevada as Portfolio Energy Credits (“PECs”). Sierra Pacific is required under Nevada Revised Statute 704.7828 to market for sale RECs that are in excess of twenty five percent of the number of RECs that are needed to comply with its projected portfolio energy standard for the subsequent calendar year.

Interested buyers should provide Sierra Pacific with the requested information on the attached 2021 Bid Response Form, Exhibit A, by no later than September 20, 2021, by 9:00 a.m. Pacific Prevailing Time (PPT) by e-mail to: NVERECOffer@NVEnergy.com. When submitting a bid, please put the following in the subject line of the email: “2021 NVE REC Offer”, followed by the name of your company.

RFP Description and Definitions

Seller:

Sierra Pacific Power Company, dba NV Energy

Buyer:

Counterparty

Product:

Certain offered RECs, from eligible renewable resources shown in Exhibit B, with the following characteristics:

- Unbundled, pre-2021 net RECs,
- Western Renewable Energy General Information System (“WREGIS”) certified,
- RECs listed are sourced from generators that have been certified by the Public Utilities Commission of Nevada (“PUCN”) as Nevada Renewable Portfolio Standard (“RPS”) eligible resources subject to limitations,
- “REC” has the meaning given to Green Attributes in Nevada as defined under Nevada Revised Statute 704.7815 and 704.78215,
- All RECs are from renewable generating resources located within the State of Nevada.

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REC Quantity Offered:

The maximum number of RECs offered cannot exceed to maximum available per Exhibit B. Sierra Pacific may in its discretion further limit the maximum number of RECs for which it will accept bids. The minimum number of RECs bid by a prospective buyer should not be less than 5,000 RECs and all bid quantities must be in increments of 1,000 RECs.

REC:

1 REC or $\underline{k}PC = 1$ megawatt hour of renewable energy produced

REC Price Offer:

\$/REC

REC Delivery:

RECs will be transferred to the Buyer's account in The Western Renewable Energy General Information System ("WREGIS").

Underlying Agreement:

Existing enabling agreement or WSP Agreement – Schedule R

Contingencies:

The proposed terms and conditions are for discussion purposes only and are not an offer or commitment of Sierra Pacific to enter into any transaction. Sierra Pacific reserves the right to terminate this offer at any time prior to deadline. The number of and specific types of RECs offered for sale is subject to change until the execution of a definitive agreement between seller and buyer containing all appropriate provisions, including those related to dispute resolution, credit and governing law. Submission of the 2021 Sierra Pacific REC RFP Response Form, Exhibit A, does not obligate either party to enter into a transaction or definitive agreement with the other party, and each party may cease discussion for any reason at any time.

Sierra Pacific may seek regulatory review by the Public Utilities Commission of Nevada ("PUCN"), in the case of certain sales to ensure that the sale does not in any way disadvantage Sierra Pacific's customers.

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Exhibit A – 2021 Sierra Pacific REC RFP Response Form

Please return by e-mail to: NVERECOffer@NVEnergy.com

Buyer Contact Information:

Counterparty Name: _____

Contact Name: _____

Contact Number: _____

Contact Email: _____

Prospective Buyers are requested to specify the RECs that they are interested in purchasing based on the RECs offered for sale per Exhibit B. Note, the maximum quantity requested cannot exceed 186,387 RECs.

Resource	Registry	Certification	Year	Bid Price \$/REC	Quantity Minimum 1,000

The above RFP response does not constitute an obligation on the part of the bidder to purchase or Sierra Pacific to sell the above requested RECs until both parties have reached a binding agreement. All agreements may be subject to further regulatory review by the Public Utilities Commission of Nevada (“PUCN”).

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Exhibit B – RECs Offered

The 2021 Reverse Request of Proposal is capped at a maximum of **186,387** RECs/(kPCs)

Resource	Registry	Certification	Vintage	Type	Maximum Qty Available by Category
Geothermal	WREGIS	PUCN	2020	Net	186,387
Small Hydro	WREGIS	PUCN	2020	Net	51,438
Solar Photovoltaic	WREGIS	PUCN	2020	Net	13,032
Solar Thermal	WREGIS	PUCN	2020	Net	23,608

Notes:

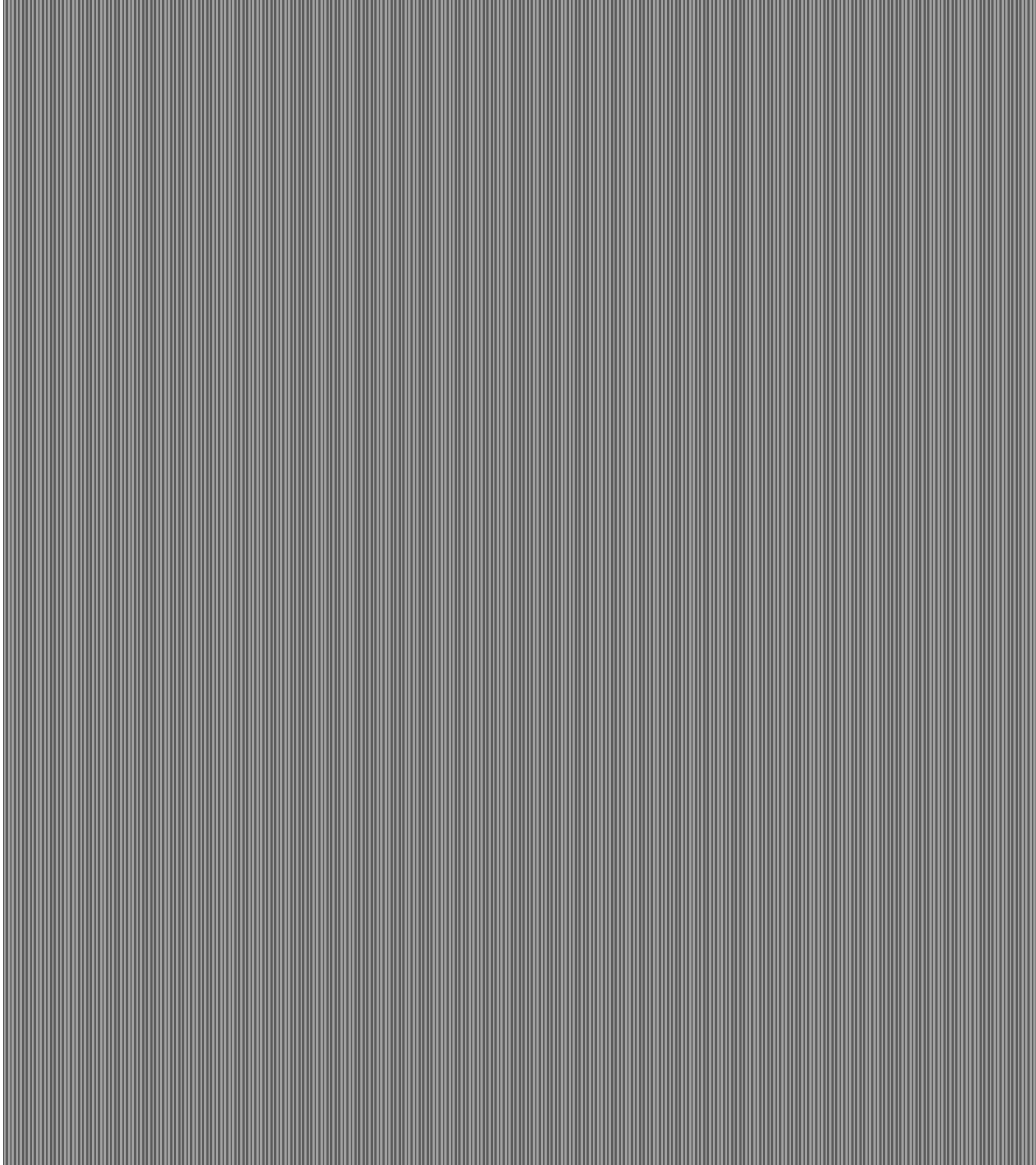
All of the above RECs come from renewable facilities located in the State of Nevada. The RECs come from facilities that have been certified by Public Utilities Commission of Nevada, and the RECs generated can be used towards meeting the State of Nevada’s Annual Renewable Portfolio Standard. Sierra Pacific has entered into a long-term purchase power agreement with the facilities supplying the RECs under which Sierra Pacific has the exclusive rights to the net energy produced by the facility and all environmental attributes, including the renewable energy credits, associated with the energy production. The above quantities represent the maximum number of credits available by each resource category. While buyers can choose to purchase RECs from any combination of the above resources, in no case shall the total number of credits requested exceed the 186,387 REC cap.

5.7 2021 REVERSE RFP OFFER MAILING LIST

COMPANY
Circus Circus Las Vegas
Caesars
Georgia Pacific
MGM Resorts
The Sahara Las Vegas
Wynn Las Vegas
The Peppermill
Switch LTD
Constellation
Tenaska Power Services
Macquarie Energy, LLC
Exelon Generation Company, LLC
Shell Energy North America (US), L.P.
Morgan Stanley Capital Group, LLC
3 Phases Renewable
3Degrees Inc
Act Commodities
AEP Energy, Inc.
Amerex Energy Services
Avangrid Renewables
Blue Delta Energy
GO2 Markets, Inc.
Carbon Solutions Group (CSG)
Good Energy
Geenlight Energy Group
Karbone, Inc.
NextEra Energy Resources
OneEnergy Renewables
Sterling Planet
STX Commodities
Valley Electric Association
Harrison Renewables

5.8 2021 REVERSE RFP SUMMARY OF BIDS RECEIVED

CONFIDENTIAL



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 22-040__ upon the persons listed below by electronic mail:

Donald 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 Drive 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 15th day of April, 2022.

/s/ Jane Harrell
Jane Harrell
Senior Legal Administrative Assistant
Nevada Power Company
Sierra Pacific Power Company