22-09006

Public Utilities Commission of Nevada
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In accordance with NRS Chapter 719,
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FILED WITH THE PUBLIC UTILITIES COMMISSION OF NEVADA - 4/24/2023

NVEnergy®

April 21, 2023

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

RE: Docket No. 22-09006 – Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of the Third Amendment to its 2021 Joint Integrated Resource Plan.

Dear Ms. Osborne:

On March 24, 2023, the Public Utilities Commission of Nevada ("Commission") issued an order accepting in part and modifying in part the Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy (together, "NV Energy") for approval of the Third Amendment to its 2021 Joint Integrated Resource Plan (the "Order"). Included in the order were two compliance items regarding NV Energy's Transportation Electrification Plan ("TE Plan"):

> Compliance 6. Within 30 days of the date of issuance of this Order, Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy must file in this Docket the approved Transportation Electrification Plan budgets as modified by this Order.
>
> Compliance 7. Within 30 days of the date of issuance of this Order, Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy must file in this Docket revised tariffs consistent with this Order.

Revised tariff sheets are enclosed as Exhibit A. Due to the significant modifications required by the Order, NV Energy provides the following explanation of the changes that are reflected in this compliance filing to ensure greater transparency.

Compliance 6 – Explanation of Adjustments to the TE Plan Budget

Consistent with Order, NV Energy provides an updated budget in a similar form to Table TEP-39.[1]

[1] March 24, 2023, Order at 111, 117, para. 284, 295.

Plan Budget	Budget in thousands		
	Sierra Pacific	Nevada Power	Total
Education Services	**$0**	**$0**	**$0**
Personal Vehicle Driver Programs	**$3,132**	**$12,196**	**$15,329**
Residential Technical Advisory Services	$0	$0	$0
Lower Income Telematics Program	$0	$0	$0
Lower Income Electric Vehicle Rebate Program	$0	$0	$0
Dealer Partner Program	$0	$0	$0
Residential Charging Incentive Program	$0	$0	$0
Residential Turnkey Charging Program	$0	$0	$0
Multi-family Charging Infrastructure Program	$0	$0	$0
Workplace Charging Infrastructure Program	$0	$0	$0
Interstate Corridor Charging Depot Program	$3,132	$12,196	$15,329
Urban Charging Depot Program	$0	$0	$0
Personal Vehicle Program Administration	$0	$0	$0
Commercial Vehicle Driver Programs	**$18,102**	**$10,151**	**$28,253**
Commercial Technical Advisory Services	$0	$0	$0
State, Local, and Tribal Governments Fleet Telematics Program	$0	$0	$0
Fleet Charging Infrastructure Program	$0	$0	$0
Fleet Charging Depot Program	$0	$0	$0
Transit Electrification Grant	$0	$0	$0
Electric School Bus Vehicle-to-Grid Trial	$18,102	$10,151	$28,253
Commercial Vehicle Program Administration	$0	$0	$0
Grid Integration	**$250**	**$750**	**$1,000**
Managed Charging	$0	$0	$0
System Development[2]	$250	$750	$1,000
Program Management	**$1,188**	**$3,563**	**$4,751**
Contingency	**$1,794**	**$5,383**	**$7,178**
Totals	**$24,467**	**$32,044**	**$56,511**

The following modifications are reflected in the revised budget.

[2] System Development now includes only the Inflation Reduction Act Innovation Demonstration Program.

Approved Programs

- Removed all programs except (1) Interstate Corridor Charging Depot Program, (2) Electric School Bus Vehicle-to-Grid Trial Program, and (3) Inflation Reduction Act Innovation Demonstration Program.[3]

Program Management & Administration Costs

- Removed proposed Program Management, Residential Vehicle Program Administration, and Commercial Vehicle Program Administration.[4] Replaced with a new Program Management budget set at 10 percent of program costs.[5]
- Note, the Order reduces program management and administration costs such that the scope of work that can be performed for this amount during the TE Plan period is significantly limited. As proposed, the dual budgets of "program management" and "program administration" included a number of different activities, including, but not limited to: plan development, program administration, customer outreach and education, asset management, workflow management, and monitoring and diagnostics. As reduced by the Order, this cost category will likely only cover plan development and program administration costs.

Contingency

- Removed plan-level contingency and site profile-level contingency. Replaced with new contingency budget set at 16.1 percent of program costs.[6]

Operations & Maintenance ("O&M")

- Removed O&M from program budgets.[7]
- Note, the maximum O&M incentives for customer-owned sites under the Interstate Corridor Charging Depot Program is $375,000.[8] Per the Order, these customer O&M incentives are not included in the budget,[9] but are approved program costs that may be included in the regulatory asset.[10]

Regulatory Asset Treatment

- The Order permits approved program costs, excluding capital expenditures, to be included in the regulatory asset, similar to other public policy programs.[11]
    - Consistent with the Order and other public policy programs, program management costs will be included in the regulatory asset.

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[3] Order at 111-12, para. 285.
[4] *Id.* at 112, para. 286.
[5] *Id.*
[6] *Id.* at 112, para. 287.
[7] *Id.* at 113-15, para. 289.
[8] This amount assumes all Interstate Corridor Charging Depot Program participants choose customer-owned sites and assumes all site receive the maximum incentive for the full five-year period. This amount was calculated by multiplying the total number of potential sites (10) by the total O&M incentive ($7,500) times 5 years. TE Plan at 69-70.
[9] Order at 113-15, para. 289.
[10] *Id.* at 117, para. 296 ("Regulatory asset treatment is approved for any customer or third-party infrastructure and incentive payments made pursuant to the Interstate Corridor Charging Depot program.")
[11] *Id.* at 117-18, para. 296, 298.

- As the breakdown of NV Energy-owned and customer-owned sites is not yet known, NV Energy cannot currently estimate the total TE Plan costs that will receive regulatory asset treatment.

Compliance 7 – Explanation of Residential Multi-Family EV Allowance Adder

The Order directs NV Energy to create an EV Allowance Adder for residential Multi-Family customer classes that is "uniform" to the EV Allowance Adder approved by the Commission for residential Single-Family customers.[12]

The Multi-Family EV Allowance Adder reflected in the updated Rule 9 schedules (attached hereto as Exhibit A) provides a maximum additional allowance of $878 per unit in Sierra's service territory and $769 per unit in Nevada Power's service territory for a garage or parking installation that is served through the same meter as the customer's residence.

Though the Multi-Family EV Allowance Adder was calculated in the same manner as the Single-Family EV Allowance Adder, the creation of the Multi-Family EV Allowance Adder required a small adjustment to the data used. For both EV Allowance Adders, square footage data was used to arrive at the Estimated Peak Demand per unit. For the Multi-Family EV Allowance Adder, NV Energy used U.S. Census data instead of the Federal Reserve Economic Data ("FRED") square footage data used for the Single-Family EV Allowance Adder because the FRED does not supply square footage data for multi-family homes.

	EV ALLOWANCE ADDER CALCULATION	Multi-Family		Single-Family	
		North	South	North	South
A	Current Standard Allowance / Unit	$1,262	$982	$3,075	$3,890
B	VA/sq ft.	3.6	3.2	3.6	3.2
C	Average sq ft.	1150	1150	2000	2000
D	EPD kVA / Unit (B*C/1000)	4.1	3.7	7.2	6.4
E	$/ kVA (A/D)	$305	$267	$427	$608
F	Standardized Charger Size 9.6 kW	9.6	9.6	9.6	9.6
G	$ / Charger (F*E)	$2,926	$2,562	$4,100	$5,835
H	Expected EV Adoption Rate	30%	30%	30%	30%
I	EV Adder Allowance(H*G)	$878	$769	$1,230	$1,751

Facility designs and parking arrangements for multi-family unit complexes can vary significantly from one project to another. Some multi-family housing complex parking may not fall under residential Multi-Family tariffs. Instead, complexes may be served as alternative rate classes such as GS or LGS (where the standard Rule 9 allowance is kVA-based rather than per unit), eliminating the need for an EV Allowance Adder to accommodate electric vehicle charger installations. To determine how best to apply an EV Allowance Adder for the Multi-Family rate classes, NV Energy looked to the current Commission-approved Residential Multi-Family Electric Vehicle Rate Rider

[12] *Id.* at 128, para. 320.

tariff, which allows application of the tariff to a separate garage, provided that the separate garage is served through the same meter as the customer's residence. NV Energy carried this applicability through to the Multi-Family EV Allowance Adder, meaning that the EV Allowance Adder will be available for charger installations that are served from the same meter as the household load. Multi-family housing complexes that do not provide parking that is served from the same meter as the household load will likely fall under a different rate class and be eligible for that rate class's applicable standard Rule 9 allowance.

Compliance 7 – Explanation of Nevada Power Electric Vehicle Commercial Charging Rider ("EVCCR") and NV Energy Electric Vehicle Charging Network ("NVEVCN") Tariffs

The time-of-use periods for Nevada Power's EVCCR and NVEVCN tariffs have been updated pursuant to the Order.[13]

Should you have any questions regarding this filing, please contact me at 775-834-5696 or at Deborah.Bone@nvenergy.com.

Sincerely,

/s/ Deborah Bone
Deborah Bone
Senior Attorney

[13] *Id.* at 132, para. 331.

EXHIBIT A

Rule No. 9
ELECTRIC LINE EXTENSIONS
(Continued)
ATTACHMENT 3 – RULE 9 OF SIERRA PACIFIC POWER COMPANY
ALLOWANCES FOR LINE EXTENSIONS OTHER THAN MASTER PLANNED COMMUNITIES

Allowance provided under Section B.3, (Allowances) of this Rule for Line Extensions other than those designated as Master Planned Communities as referred to in this Rule shall be calculated as follows:

Customer Class*	Allowance	
Schedule D-1, per unit	$3,075	
EV Allowance Adder (Incremental and applied to install EV Charger Capable installations)	$1,230	(N) (N)
Schedule DM-1, per unit	$1,262	
EV Allowance Adder (Incremental and applied to install EV Charger Capable installations)**	$878	(N) (N)
Schedule GS-1, per meter		
Secondary voltage (less than 4 kV), per meter	$6,423	
Primary voltage (4 kV – 25 kV), per meter	$6,423	
High voltage distribution (greater than 25 kV): A Revenue-Based Allowance calculated for high voltage distribution investments.		
Schedule IS-1, per kVA	$87	
Schedule IS-2: A Revenue-Based Allowance calculated for low voltage distribution investments. Currently, this rate class is not eligible for Allowances because the IS-2 rate does not recover any facilities investments.		
Schedule GS-2		
Secondary voltage (less than 4 kV), per kVA	$239	
Primary voltage (4 kV – 25 kV), per kVA	$100	
High voltage distribution (greater than 25 kV): A Revenue-Based Allowance calculated for high voltage distribution investments.		
Schedule GS-2-TOU		
Secondary voltage (less than 4 kV), per kVA	$114	
Primary voltage (4 kV – 25 kV), per kVA	$100	
High voltage distribution (greater than 35 kV): A Revenue-Based Allowance calculated for high voltage distribution investments.		
Schedule GS-3		
Secondary voltage (less than 4 kV), per kVA	$87	
Primary voltage (4 kV – 25 kV), per kVA	$100	
High voltage distribution (greater than 25 kV): A Revenue-Based Allowance calculated for high voltage distribution investments.		
Schedule GS-4: GS-4 Applicants have no specific Allowance, however, customer specific facilities investments may be made by Utility pursuant to this Rule. The Total Cost for the customer specific facilities shall be recovered in accordance with the specific service agreement and rates pursuant to Schedule No. GS-4 or as provided for in Section A.26, (Payment Alternatives).	None	

*Allowance for optional classes are the same as the standard offering schedule.

** The DM-1 EV Allowance Adder is applied to EV Capable installations that share the common meter with the customer's residential unit. (N)

(Continue)

Rule No. 9
ELECTRIC LINE EXTENSIONS
(Continued)

ATTACHMENT 3 – RULE 9 OF NEVADA POWER COMPANY

ALLOWANCES FOR LINE EXTENSIONS OTHER THAN MASTER PLANNED COMMUNITIES

Allowance provided under Section B.3, (Allowances) of this Rule for Line Extensions other than those designated as Master Planned Communities as referred to in this Rule shall be calculated as follows:

Customer Class*	Refund	
Schedule RS, per unit	$3,890	
EV Allowance Adder (Incremental and applied to EV Charger Capable installations)	$1,751	(N) (N)
Schedule RM, per unit	$982	
EV Allowance Adder (Incremental and applied to EV Charger Capable installations) **	$769	(N) (N)
Schedule LRS, per kVA	$385	
Schedule GS, per meter	$2,304	
Schedule LGS-1, per kVA	$303	
Schedules LGS-2 and LGS-WP-2		
Secondary voltage (less than 4 kV), per kVA	$141	
Primary voltage (4 kV – 35 kV), per kVA	$140	
Schedules LGS-3 and LGS-WP-3		
Secondary voltage (less than 4 kV), per kVA	$126	
Primary voltage (4 kV – 35 kV), per kVA	$54	
High voltage distribution (greater than 35 kV): A Revenue-Based Allowance calculated for high voltage distribution investments		
Schedules LGS-X and LGS-X-WP	None	

*Allowance for optional classes are the same as the standard offering schedule.
** The RM EV Allowance Adder is applied to EV Capable installations that share the common meter with the customer's residential unit. (N)

(Continued)

Schedule No. EVCCR–TOU
ELECTRIC VEHICLE COMMERICAL CHARGING RIDER TIME-OF-USE
(Continued)

SPECIAL CONDITIONS (Continued)

3. **Transition to Cost-Based Rates Schedule.** The ten-year transition period adjustments to rates of the otherwise applicable schedule ends on April 1, 2029. The schedule in which the Demand Rate Reduction and Transition Rate Adders are applicable, is as follows:

Start Date	Transition Schedule
April 1, 2019	100%
April 1, 2020	90%
April 1, 2021	80%
April 1, 2022	70%
April 1, 2023	60%
April 1, 2024	50%
April 1, 2025	40%
April 1, 2026	30%
April 1, 2027	20%
April 1, 2028	10%

4. **Time-of-Use (TOU) Periods.** In addition to the TOU periods defined under the applicable rate schedules, this rider provides daily time periods for a reduced rate during a Special EV Recharge periods based upon Pacific Standard Time/Pacific Daylight Time and defined as follows: (T)

Summer (June - September)
EV Recharge Period 12:01 AM – 12:00 PM Daily (C)

Winter (October – May)
EV Recharge Period 12:01 AM – 12:00 PM Daily (C)

5. **Terms of Service.** Prior to receiving service under this rate schedule, the Customer must disclose to the Company the number of individual vehicle chargers to be installed at the electric vehicle charging station, the type and capacity of each vehicle charger installed, and the maximum number of vehicles that can simultaneously use the station to recharge batteries. A Customer receiving service under this Schedule may elect to switch to another applicable rates schedule but only after receiving service under this Schedule for a minimum of 12 (twelve) consecutive months. If a Customer elects to discontinue service on this Schedule, the Customer will not be permitted to return to this Schedule for a period of one year.

(Continued)

Schedule No. NVEVCN
NV Energy Electric Vehicle Charging Network
(Continued)

SPECIAL CONDITIONS

1. **Time-of-Use (TOU) Periods.** Daily time periods will be based upon Pacific Standard Time/Pacific Daylight time and are defined as follows: (T)

From June 1, 2023

Summer (June – September)		
On-Peak	3:01 p.m. – 9:00 p.m Daily	(D,C)
Summer EV Recharge Period	12:01 a.m. – 12:00 p.m. Daily	(C)
Off-Peak	All Other Summer Hours	(C)
Winter (October – May)		
Winter EV Recharge Period	12:01 a.m. – 12:00 p.m. Daily	(C)
Winter	All Winter Hours	(D,C)

The winter period will consist of eight regularly scheduled billing periods for service provided in the months of October through May. The summer period will consist of four regularly scheduled billing periods for service provided in the months of June through September.

2. **Availability.** This tariff is designed specifically for retail service by Utility owned EV chargers to drivers and operators of electric vehicles. EV chargers owned and/or operated by non-Utility entities are not eligible under this tariff.

3. **Excludability.** EV owners or operators may not request service(s) under this tariff for any other purpose other than the purchase of electricity from the Utility for the express purpose to charge an EV at a Utility owned EV charging station.

4. **Tampering or Intent to Defraud.** If the acts of an EV owner or operator are such as to indicate to the Utility that the Customer intends to defraud the Utility or the Customer tampers or interferes with the operation of the Utility's Meter or EV charging station, the Utility may deny any request for, or revoke, service under this UOEVC Tariff.

5. **Right of Access**. The Utility may deny service under this UOEVC Tariff to any EV owner or operator who interferes with the access to EV charging of another Customer.

(Continued)

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 No. 22-09006 upon the persons listed below by electronic mail:

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DATED this 21st day of April, 2023.

/s/Wendi Kunz
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Regulatory Operations Analyst
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Sierra Pacific Power Company d/b/a NV Energy