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23-03004

Public Utilities Commission of Nevada  
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Filed For: Nevada Power Company and Sierra Pacific Power Company

In accordance with NRS Chapter 719,  
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Nevada Power Company and Sierra Pacific Power Company

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

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 Cost Recovery for the  
2022 Natural Disaster Protection Plan Regulatory Asset Account.  
Docket No. 23-03004

Prepared Rebuttal Testimony of  
**Cary Shelton-Patchell**

Nevada Power Company  
and Sierra Pacific Power Company  
d/b/a NV Energy

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9 **1. Q. PLEASE STATE YOUR NAME, OCCUPATION, BUSINESS ADDRESS**  
10 **AND PARTY FOR WHOM YOU ARE FILING TESTIMONY.**

11 A. My name is Cary Shelton-Patchell. My current position is Director, Revenue  
12 Requirement and Regulatory Accounting for Nevada Power Company d/b/a NV  
13 Energy (“Nevada Power”) and Sierra Pacific Power Company d/b/a NV Energy  
14 (“Sierra” and, together with Nevada Power, the “Companies” or “NV Energy”).  
15 My business address is 6100 Neil Road, Reno, Nevada 89511. I am filing testimony  
16 on behalf of the Companies.

17  
18 **2. Q. DID YOU PREVIOUSLY SUBMIT TESTIMONY IN THIS PROCEEDING?**

19 A. Yes, I filed prepared direct testimony in this docket on March 1, 2023. My  
20 qualifications were described in Q&A 2 and in Exhibit Shelton-Patchell-Direct-1  
21 of my direct testimony.

22  
23 **3. Q. WHAT IS THE PURPOSE OF YOUR PREPARED REBUTTAL**  
24 **TESTIMONY?**

25 A. I address Regulatory Operations Staff (“Staff”) witness Ms. Nichole Loar’s  
26 proposed adjustments, Staff witness Mr. Miguel Perez’s and Southern Nevada  
27

1 Gaming Group (“SNGG”) witness Mr. Mark Garrett’s rate impacts, and the Bureau  
2 of Consumer Protection (“BCP”) Natural Disaster Protection Program (“NDPP”)  
3 rate recommendations. I address conclusions and recommendations made by  
4 witnesses for Staff, the BCP, SNGG and Wynn Las Vegas and Smart Energy  
5 Alliance (“Wynn-SEA”) concerning carrying charges. I also address BCP witness  
6 Chairez’s and SNGG witness Garrett’s concerns that the NDPP rates shift costs or  
7 create a subsidy between Nevada Power and Sierra ratepayers.  
8

9 **RATE IMPACTS OF PROPOSED DISALLOWANCES BY STAFF WITNESS LOAR**

10 **4. Q. HAVE YOU BEEN ABLE TO CALULATE THE NDPP RATE IMPACTS**  
11 **BASED ON THE PROPOSED DISALLOWANCES BY STAFF WITNESS**  
12 **LOAR?**

13 A. Yes, to the extent that Ms. Loar provided an adjustment amount,<sup>1</sup> her proposed  
14 disallowances result in a rate impact of \$0.00000. Please note that I do not believe  
15 Ms. Loar’s adjustments are appropriate and Company witness Shazzy-Lynn  
16 Philavanh specifically addresses the proposed adjustments. However, in order to  
17 provide a rate impact analysis if the Commission were to accept Staff’s  
18 adjustments, I used the proposed disallowances from Staff Witness Loar’s  
19 workpapers that depict Operations, Maintenance, Administrative and General  
20 (“OMAG”) disallowances of \$6,310 for general OMAG and Court Reporter and  
21 Notice costs of \$37,066. I have assumed for purposes of this calculation that all of  
22 these costs were incurred on January 1, 2022, to provide for the maximum carry  
23 charges being applied as these costs detailed above do not include carry charges. I  
24 also used the Nevada Power carry charge rate of 7.14% as it also would estimate  
25 the highest possible carry charge. The \$6,310 disallowance would increase to  
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27 <sup>1</sup> Ms. Loar makes recommendations for certain disallowances that she does not quantify. I did not address those  
unquantified disallowance recommendations.

1           \$6,794 and the \$37,066 disallowance would increase to \$39,908 with estimated  
2           carry charges based on the assumptions above. Thus, the total recommended  
3           disallowances with carry costs would total \$46,702. If I divide this \$46,702 by the  
4           kWhs shown on Exhibit C to this filing, the resulting rate is less than \$0.00000 per  
5           kWh,<sup>2</sup> as I previously stated. In other words, Staff Witness Loar's recommended  
6           disallowances would have no impact on the proposed NDPP rate.

7  
8           **RATE IMPACTS OF THE NDPP CHARGES ON CUSTOMER BILLS**

9           **5.     Q.     HAS THERE BEEN TESTIMONY PROVIDED THAT ADDRESSES THE**  
10           **IMPACT THE NDPP RATE HAS ON AVERAGE BILLS FOR**  
11           **CUSTOMERS?**

12           A.     Yes. I prepared the following chart in Docket No. 23-03003 that shows the  
13           historical impact that the NDPP rate has had on average customer bills. While the  
14           Companies understand the rate impact concerns raised by Staff and other  
15           intervenors, and the Company does not discount those concerns, this table shows  
16           that the NDPP rate comprises a very small percentage of the average bill and will  
17           likely remain a small percentage in the future.

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<sup>2</sup> The resulting rate is \$0.00000132231 (\$46,702 divided by 35,318,460,991 kWh).

Table Shelton-Patchell Rebuttal-1

LN	Period	NPC Tariff RS			SPPC Tariff D-1		
		Avg Bill	Percent of / BTER / DEAA	Percent of Bill for NDPP	Avg Bill	Percent of / BTER / DEAA	Percent of Bill for NDPP
1	1/1/2019	\$96.44	99.7%	0.0%	\$93.01	97.5%	0.0%
2	4/1/2019	\$98.32	99.7%	0.0%	\$74.89	97.6%	0.0%
3	7/1/2019	\$228.93	99.7%	0.0%	\$97.52	97.5%	0.0%
4	10/1/2019	\$100.70	100.3% <sup>1</sup>	0.0%	\$76.77	100.0% <sup>1</sup>	0.0%
5	1/1/2020	\$91.40	100.3% <sup>1</sup>	0.0%	\$88.01	96.5%	0.0%
6	4/1/2020	\$110.50	100.3% <sup>1</sup>	0.0%	\$74.46	96.5%	0.0%
7	7/1/2020	\$221.99	100.3% <sup>1</sup>	0.0%	\$94.05	96.1%	0.0%
8	10/1/2020	\$114.07	100.5% <sup>1</sup>	0.2%	\$71.78	99.0%	0.2%
9	1/1/2021	\$90.34	97.5%	0.2%	\$89.38	99.1%	0.2%
10	4/1/2021	\$110.05	97.5%	0.2%	\$75.05	99.1%	0.2%
11	7/1/2021	\$225.48	97.2%	0.2%	\$112.44	99.1%	0.2%
12	10/1/2021	\$108.23	97.3%	0.4%	\$87.03	97.9%	0.5%
13	1/1/2022	\$96.85	97.5%	0.4%	\$108.04	97.9%	0.5%
14	4/1/2022	\$119.23	97.6%	0.4%	\$89.17	95.7%	0.4%
15	7/1/2022	\$265.88	97.6%	0.4%	\$125.67	95.4%	0.5%
16	10/1/2022	\$145.21	96.6%	0.9%	\$107.40	94.1%	1.0%
17	1/1/2023	\$129.31	97.1%	0.8%	\$142.41	96.8%	0.9%
18	4/1/2023	\$115.35	97.1%	0.8%	\$117.42	97.1%	0.8%
19	Average	\$137.13	98.5%	0.4%	\$95.81	97.3%	0.6%

<sup>1</sup>Other component rates resulted in an overall credit for this period.

It is important to note that the proposed rates recover costs that are prudent and reasonable, are in compliance with Nevada Revised Statutes (“NRS”) 704.7983(2)(b) and mitigate a significant risk while still representing a small component of customer bills.

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1 **CARRY CHARGES**

2 **6. Q. DO YOU AGREE WITH THE INTERVENOR TESTIMONY PRESENTED**  
3 **IN THIS DOCKET THAT CALLS INTO QUESTION THE INCLUSION OF**  
4 **CARRY CHARGES ON THE OMAG COSTS INCLUDED IN THE**  
5 **REGULATORY ASSETS PRESENTED IN THIS DOCKET?**

6 A. No. Several interveners question the appropriateness of including carry charges on  
7 the OMAG costs being deferred and that will be recovered in the NDPP rates to be  
8 set in this proceeding.<sup>3</sup> In this docket, the Companies are seeking to recover actual  
9 costs that were prudently incurred to implement NDPP projects and programs that  
10 were approved as part of the inaugural NDPP filing, consolidated Docket Nos. 20-  
11 02031 and 20-02032, as updated or amended in Docket Nos. 21-03040 and 22-  
12 08001. The NDPP costs for the projects and programs approved in these prior  
13 dockets continued to be incurred in 2022 and included in the regulatory asset to be  
14 recovered in this cost recovery filing.

15  
16 **7. Q. HAVE YOU DEVELOPED A SIMPLE DIAGRAM THAT ILLUSTRATES**  
17 **THE DELAY IN RECOVERY OF NDPP COSTS?**

18 A. Yes. As shown below, Shelton-Patchell-Rebuttal-Figure-1 depicts the time  
19 between the original budgeted projections, the incurrence of the OMAG costs and  
20 the recovery of those deferred OMAG in this proceeding.

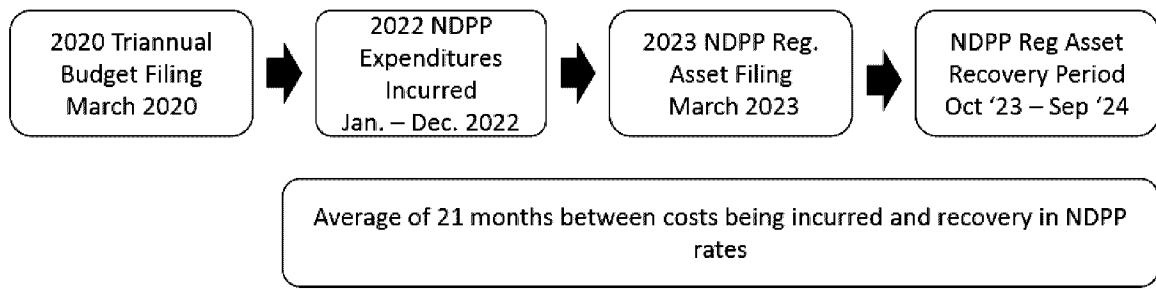
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26 <sup>3</sup> See Prepared Direct Testimony of Andrew S. Greene, Jr. at page 4, lines 12-14; page 5, footnote 5 and lines 10-11;  
27 see also Prepared Direct Testimony of Nichole Loar at Q&A 7 and Q&A 9; see also Prepared Direct Testimony of  
Patrick A. Morton at page 13, lines 2-4; page 16, line 8-10; page 18, lines 2-3.

## NDPP Reg. Asset Recovery Timeline



8. **Q. IS IT UNUSUAL FOR THE COMMISSION TO ALLOW CARRY CHARGES FOR DEFERRED COSTS?**

A. No. The Commission allows carry charges to be calculated on other costs that the Companies do not recover in current general rates. Carrying charges are allowed on the Energy Efficiency Program and Implementation Amortization Rates and the Expanded Solar Program Costs. Carry charges have been allowed for other costs that are deferred due to general rate case orders.<sup>4</sup>

9. **Q. IS IT STANDARD NEVADA REGULATORY PRACTICE TO ALLOW A CARRY CHARGE AT THE LATEST APPROVED AUTHORIZED RATE OF RETURN WHEN CARRY CHARGES ARE ALLOWED?**

A. Yes, carry charges are normally allowed at the latest approved authorized rate of return. Section 13(2)(c) and (d) of LCB File No. R085-19 expressly states that carry charges are allowed on NDPP deferred OMAG costs at the most recently

<sup>4</sup> Docket Nos. 22-06014, 22-06015 and 22-06016, Order at paragraphs 491-513 (Feb. 16, 2023).

1 authorized rate of return. Further, the Commission specifically stated that carry  
2 charges should accrue on the NDPP regulatory assets in the orders in Dockets 20-  
3 02032<sup>5</sup> and 21-03004.<sup>6</sup>  
4

5 **10. Q. IS THIS CARRY CHARGE “PROFIT” TO THE COMPANIES AS**  
6 **SUGGESTED BY MR. MORTON?**<sup>7</sup>

7 A. Absolutely not. It reflects the time value of the monies advanced by the Companies  
8 to pay for the expenses that were incurred and are recovered in the future from  
9 ratepayers. It is a similar practice that utilities follow with regards to the Allowance  
10 for Funds Used During Construction (“AFUDC”) on capital projects. These costs  
11 are not currently recovered in general rates. To not allow these operating  
12 expenditures to earn a carry charge on these deferred costs deprives the Companies  
13 of covering their debt costs and the ability to earn a reasonable return on these  
14 advanced funds. Most importantly, Section 13(2)(c) and (d) of LCB File No. R085-  
15 19 specifically allows for a return on these operating expenditures.  
16

17 Carrying charges compensate the Companies for the delay between when these  
18 expenses were paid and when they will be recovered through the rates to be  
19 approved in this proceeding. NRS 704.7983(6) specifies that all prudent and  
20 reasonable expenditures must be recovered. Carry charges reimburse the  
21 Companies the time value of the funds that pay for NDPP costs that are not  
22 recovered in current NDPP rates. The Nevada Legislature states that the purpose  
23 and policy of enacting NRS Chapter 704 is to balance the interests of customers  
24 and public utility shareholders by providing public utilities with the opportunity to  
25

26 <sup>5</sup> Docket No. 20-02031 and 20-02032, Dec. 22, 2020 Order at paragraph 391 (f).

27 <sup>6</sup> Docket No. 21-03004, Sep. 02, 2021 at paragraph 139.

28 <sup>7</sup> See Prepared Direct Testimony of Patrick A. Morton at page 15, line 8; page 16, line 10; page 17, line 23; page 18,  
line 2



1 earn a fair return on their investments while providing just and reasonable rates to  
2 customers.<sup>8</sup>

3  
4 **11. Q. MR. MORTON RECOMMENDS THAT NDPP OMAG EXPENSES**  
5 **RECEIVE THE SAME CARRY AS PRESCRIBED IN NRS 704.655(1)(a)-(b)**  
6 **IN HIS TESTIMONY AT PAGE 19 LINES 11 THROUGH 13. DO YOU**  
7 **AGREE WITH HIS PROPOSAL?**

8 A. No. Mr. Morton continues to imply that the Companies are making a profit from  
9 the Commission allowing carry charges at the authorized rate of return. Although  
10 carry charges are recorded as interest income on the Companies' income  
11 statements, it is offset by interest expense. As explained, carry charges at the  
12 authorized rate of return provide the Companies the opportunity to earn a fair return  
13 on the funds that are advanced for the benefit of customers and, as previously  
14 discussed, have been ordered by the Commission. The Commission sets the  
15 authorized rate of return in each general rate proceeding at the level that allows the  
16 Companies to earn a fair return. Although the Companies receive the benefit of  
17 carry charges at the authorized rate of return when costs are deferred, there are  
18 instances when the Companies have over recovered deferred balances and carry  
19 charges are calculated at the same rate and are paid back to customers. The  
20 Companies recognize interest expense when this occurs. If Mr. Morton's proposal  
21 is adopted, the Companies request clarification that the carry charge rate would be  
22 at the same level for under recovered costs and over recovered costs.

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<sup>8</sup> NRS 704.001(4)

1 **12. Q. STAFF WITNESS MS. LOAR CLAIMS THAT THE COMPANIES COULD**  
2 **HAVE A PERVERSE INCENTIVE TO INCREASE OR OVERSPEND ON**  
3 **NDPP PROGRAMS AND PROJECTS. PLEASE EXPLAIN YOUR**  
4 **CONCERNS WITH HER CLAIM.**

5 A. In Ms. Loar’s prefiled direct testimony beginning at page 5, line 15 she says  
6 “Because OMAG expenses receive a rate of return there is little incentive for the  
7 Company to limit spending which could create a perverse incentive to spend.” I  
8 disagree with Ms. Loar’s claim. The Companies have included costs in this filing  
9 that were incurred only to mitigate the potential effects of natural disasters as  
10 mandated by the Nevada Legislature, and these costs are subject to prudence review  
11 and audit by Staff and intervenors and approval by the Commission. There is no  
12 “perverse incentive” afforded the Companies in meeting a legislative mandate, nor  
13 can the Companies be accused of expending funds just to do so given all costs are  
14 subject Commission oversight.<sup>9</sup> Moreover, Ms. Loar provides no evidence to  
15 support her unsubstantiated claim.

16  
17 **NDPP RATE COST SHIFT OF SUBSIDY**

18 **13. Q. MR. CHAIREZ AND MR. GARRETT SUGGEST THAT THE NDPP RATES**  
19 **SHIFT COSTS<sup>10</sup> OR CREATE A SUBSIDY<sup>11</sup> BETWEEN NEVADA**  
20 **POWER AND SIERRA CUSTOMERS. DO YOU AGREE?**

21 A. No. The Companies have calculated the NDPP rates in compliance with the  
22 procedures ordered by the Commission in the previous NDPP regulatory asset  
23 filings and, therefore, there is no cost shifting or ongoing subsidy.

24  
25 <sup>9</sup> In fact, the opposite is true. Carry does not create an incentive for spending, it simply compensates the Companies  
26 for amounts spent implementing NDPP until those costs can be recovered in rates. Without carry, the Companies  
27 would instead be incentivized to minimize spending on NDPP programs or be forced to forego a reasonable rate of  
28 return on those expenses.

<sup>10</sup> See Prepared Direct Testimony of David S. Chairez at Q&As 15 through 17.

<sup>11</sup> See Prepared Direct Testimony of Mark E. Garrett at Q&A 7.

1 14. Q. MR. CHAIREZ AND MR. GARRETT SUGGEST THAT THE  
2 METHODOLOGY PROPOSED BY THE COMPANIES VIOLATES “RATE  
3 MAKING PRINCIPLES”<sup>12</sup> AND RESULTS IN RATES THAT ARE NOT  
4 “JUST AND REASONABLE.”<sup>13</sup> DO YOU AGREE?

5 A. No. Mr. Chairez and Mr. Garrett are referring to principles used in general rate  
6 proceedings. As Mr. Garrett describes in his Q&A 16, a generally accepted  
7 ratemaking rule is that costs are recovered from those who cause the cost to be  
8 incurred. In his Q&A 18, Mr. Chairez points out that just and reasonable rates  
9 result when customer rates are set based on the cost to provide service to that  
10 customer. The Companies strive to set rates in general rate proceedings based on  
11 these principles, but this proceeding is quite different from a general rate  
12 proceeding. In this filing, the Companies are seeking recovery of costs that have  
13 been incurred to carry out a legislative mandate and deferred for recovery in  
14 compliance with regulations adopted to specify the cost recovery mechanism. That  
15 is not the case in a typical general rate proceeding where a test year is used to  
16 determine the recovery of the expenses that the utility will incur during the period  
17 the general rates are in effect. In addition, the Commission has determined in prior  
18 NDPP cost recovery cases that all rate classes in both service territories benefit  
19 from the natural disaster mitigation efforts making their claims unjustified.  
20 Because this proceeding is very different from a general rate proceeding and NDPP  
21 is a public policy program, the criticisms by Mr. Chairez and Mr. Garrett should  
22 not be accepted by the Commission. The Companies’ witness Mr. Murray  
23 comments on this further in his rebuttal testimony.

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27 <sup>12</sup> *Ibid* at Q&A 16.

<sup>13</sup> *See* Prepared Direct Testimony of David S. Chairez at Q&A 18.

1 15. Q. DO MR. CHAIREZ OR MR. GARRETT CALCULATE ANY REVISED  
2 RATES BASED ON THEIR “CLAIMED” COST SHIFT OR SUBSIDY  
3 ISSUES THEY BELIEVE TO EXIST?

4 A. Mr. Chairez calculates rates based on two different scenarios or options that he  
5 proposes to the Commission for the NDPP regulatory asset recovery. Mr. Chairez’s  
6 proposed rates are as follows:

7  
8 **Table -Shelton-Patchell-Rebuttal-2**

9 Chairez Recommendation #3

	Nevada Power <sup>14</sup>	Sierra Pacific <sup>15</sup>
Bundled Customers	\$0.00019	\$0.00295
Distribution Only Service (“DOS”)	\$0.00017	\$0.00249

13 Chairez Recommendations #6 and #7

	Nevada Power <sup>16</sup>	Sierra Pacific <sup>17</sup>
Bundled Customers	\$0.00025	\$0.00279
DOS	\$0.00017	\$0.00249

17  
18 These rates are significantly different from the rates calculated and proposed by the  
19 Companies. Mr. Garrett does not calculate any revised rates based on his subsidy  
20 claim.

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25 \_\_\_\_\_  
26 <sup>14</sup> See Prepared Direct Testimony of David S. Chairez, page 18, lines 2-3.

27 <sup>15</sup> *Ibid*, page 18, lines 6-7.

<sup>16</sup> *Ibid*, page 25, lines 23-24.

<sup>17</sup> *Ibid*, page 26, lines 2-3.

1 **16. Q. WHY DOES MR. CHAIREZ PROPOSE DIFFERENT RATES FOR DOS**  
2 **CUSTOMERS?**

3 A. In his Q&A 25, he indicates that DOS customers pay a third party for transmission  
4 service and should not be charged for NDPP transmission costs. The Commission  
5 addressed this issue in last year's docket by ruling that DOS customers are not  
6 double charged because the third-party rates referenced by Mr. Chairez were set  
7 before NDPP was implemented. Therefore, DOS customers do not pay any NDPP  
8 transmission costs to the third-party transmission provider.<sup>18</sup>  
9

10 **17. Q. HAVE YOU CALCULATED THE RATE AND AMOUNT OF MR.**  
11 **CHAIREZ'S PROPOSED COST SHIFT FROM NEVADA POWER DOS**  
12 **CUSTOMERS TO BUNDLED CUSTOMERS?**

13 A. Yes. Overall, the NPC DOS customer class would see a reduction of \$2,339,693.  
14 I calculated this by taking the difference in the DOS rate proposed by Mr. Chairez  
15 above of \$0.00017 and the proposed Nevada Power NDPP rate of \$0.00101  
16 (Exhibit C, Page 1, Column (c), Line 21). This difference is \$0.00084 which is  
17 multiplied by the DOS kWh sales of 2,785,348,605 (Exhibit C, Page 6, Column (n),  
18 Line 5).  
19

20 **18. Q. DID YOU CALCULATE THE RATE IMPACTS ON A RESIDENTIAL AND**  
21 **MULTI-FAMILY TYPICAL BILL CALCULATION BASED ON MR.**  
22 **CHAIREZ'S PROPOSED RATES?**

23 A. Yes. I calculated a typical bill calculation based on Mr. Chairez's two rate  
24 proposals.  
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27 <sup>18</sup> Docket No. 22-03006, Oct. 11, 2022 Order at paragraph 98.

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TABLE Shelton-Patchell Rebuttal-3					
Typical Monthly Bill Residential and Multi-family					
Chairez Recommendation #4 and #5 Rate Impacts					
	Billing	As			NDPP
	w/o NDPP	Filed	BCP #4 & #5	Difference	Change
Nevada Power		\$ 0.00101	\$ 0.00019	\$(0.00082)	-81.2%
Sierra Pacific		\$ 0.00114	\$ 0.00295	\$ 0.00181	158.8%
NPC Single Family	\$ 192.01	\$ 1.11	\$ 0.21	\$ (0.90)	-81.1%
SPPC Single Family	\$ 128.83	\$ 0.91	\$ 2.35	\$ 1.44	158.2%
NPC Multi family	\$ 113.90	\$ 0.69	\$ 0.13	\$ (0.56)	-81.2%
SPPC Multi family	\$ 73.20	\$ 0.53	\$ 1.38	\$ 0.85	160.4%

TABLE Shelton-Patchell Rebuttal-4					
Typical Monthly Bill Residential and Multi-family					
Chairez Recommendation #8 and #9 Rate Impacts					
	Billing	As			NDPP
	w/o NDPP	Filed	BCP #8 & #9	Difference	Change
Nevada Power		\$ 0.00101	\$ 0.00025	\$(0.00076)	-75.2%
Sierra Pacific		\$ 0.00114	\$ 0.00279	\$ 0.00165	144.7%
NPC Single Family	\$ 192.01	\$ 1.11	\$ 0.27	\$ (0.84)	-75.7%
SPPC Single Family	\$ 128.83	\$ 0.91	\$ 2.22	\$ 1.31	144.0%
NPC Multi family	\$ 113.90	\$ 0.69	\$ 0.17	\$ (0.52)	-75.4%
SPPC Multi family	\$ 73.20	\$ 0.53	\$ 1.31	\$ 0.78	147.2%

19. Q. DOES THIS CONCLUDE YOUR PREPARED REBUTTAL TESTIMONY?  
A. Yes.

AFFIRMATION

Pursuant to the requirements of NRS 53.045 and NAC 703.710, CARY SHELTON-PATCHELL, states that she is the person identified in the foregoing prepared testimony and/or exhibits; that such testimony and/or exhibits were prepared by or under the direction of said person; that the answers and/or information appearing therein are true to the best of her knowledge and belief; and that if asked the questions appearing therein, her answers thereto would, under oath, be the same.

I declare under penalty of perjury that the foregoing is true and correct.

Date: July 10, 2023

  
CARY SHELTON-PATCHELL

Nevada Power Company  
and Sierra Pacific Power Company  
d/b/a NV Energy

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