

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

Investigation Addressing Rate Misclassifications )  
by Nevada Power Company d/b/a NV Energy and ) Docket No. 25-05010  
Sierra Pacific Power Company d/b/a NV Energy. /

**NEVADA POWER COMPANY D/B/A NV ENERGY AND  
SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY'S  
COMMENTS**

Nevada Power Company d/b/a NV Energy ("Nevada Power") and Sierra Pacific Power Company d/b/a NV Energy ("Sierra" and, together with Nevada Power, the "Companies" or "NV Energy") hereby file these comments pursuant to the Public Utilities Commission of Nevada's (the "Commission") Notice of Investigation and Notice of Workshop issued on July 28, 2025, in this docket. Consistent with the Commission's direction, these comments describe the extent of the rate misclassification and overcharging of customers, how the misclassifications appear to have occurred, and NV Energy's proposal to provide refunds to affected customers.

NV Energy respectfully submits this filing to acknowledge and address significant process errors that resulted in the misidentification of more than 42,856 multifamily residential premises as single-family residential premises. We deeply regret these failures and recognize the impact the failures had on affected customers. Although there is legal precedent for a shorter refund period, in the interest of transparency and fairness, NV Energy proposes to issue additional refunds to impacted customers, retroactive to June 23, 2017, with interest at the Companies' customer deposit rate. For customers with active accounts, the Companies propose to make these refunds in the form of bill credits. For those customers that do not have active accounts, the refunds will be in the form of checks mailed to the former customer's last known address. We are committed to correcting these issues and ensuring that our systems and processes uphold the standards expected by the Commission and our customers. Likewise, we are committed to taking the steps necessary to regaining public trust, as we value our social license to serve Nevadans.

1           **A. Background and Issue Overview**

2           In 2002, both Sierra and Nevada Power implemented a distinct rate schedule to serve  
3 customers in residential multi-family units. Generally, this rate schedule provided a lower  
4 volumetric and lower basic service charge than the residential single-family unit rate schedule.

5           NV Energy's multi-family rate schedule applies to separately metered single-family  
6 dwellings where the dwelling is part of a multi-unit complex. Multi-unit complex is not a defined  
7 term in NV Energy's rules and tariffs but was historically interpreted as residential dwellings  
8 with a common or shared wall, including what would commonly be referred to as duplexes,  
9 triplexes, quadplexes, townhomes, apartments and condominiums. The terms used by local  
10 county assessors for these dwelling types vary by jurisdiction within NV Energy's service  
11 territories.

12           In January 2024, a customer notified NV Energy that their multi-family residence had  
13 been incorrectly billed under the single-family rate schedule. NV Energy reviewed the  
14 customer's account, confirmed this finding, and promptly corrected the account. Proactively,  
15 NV Energy reviewed the rates of all the units within that same multi-family unit complex,  
16 discovered the same error, and corrected and adjusted the rate class for those additional  
17 residences located in that same complex.

18           Between March and June 2024, NV Energy, through communications with customers,  
19 determined that two additional, unrelated multi-family unit complexes were also being billed  
20 under the single-family rate schedule. This finding led NV Energy to conduct a further review  
21 of its customer billing system to determine the scope and scale of this issue and whether other  
22 premises were misclassified. A review of the system identified other premises with similar  
23 discrepancies. To date, NV Energy has identified at least 42,856 multi-family residential  
24 premises were misclassified where customers residing at those premises were charged pursuant  
25 to the wrong rate schedule.<sup>1</sup> This is less than 10 percent of the multi-family residential premises  
26 in NV Energy's service territories. NV Energy converted these accounts associated with these

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27           <sup>1</sup> As discussed in Section B(2) below, there are additional multi-family residential premises that have been  
28 misclassified that were missed in the earlier stages of the Companies' investigation because of issues with the GIS  
land use data.

premises to the correct rate schedule and issued refunds in the form of bill credits for a six-month period to current customers who reside at these premises. NV Energy also credited inactive customer accounts who had resided at these premises and transferred the credit if the customer had another active account or issued the refund via check to the customer's last known address if the customer did not have an active account.<sup>2</sup> NV Energy sent letters to impacted customers informing them of the rate schedule error, the credit or refund, and the rate adjustment going forward.

## **B. Investigation, Analysis, and Initial Refunds**

### **1. Identification of Accounts**

To identify the universe of premises impacted, NV Energy began reviewing residential dwellings in its customer billing system and compared this information with relevant external sources of residence classifications (such as county assessor records) to identify any rate classification conflicts as compared to the rate classification on record in the NV Energy system.<sup>3</sup> A team of analysts and programmers created queries to identify accounts with discrepancies between dwelling types and rate codes in the Banner Customer Information System ("CIS") database across the Companies' service territories based on available customer billing records.<sup>4</sup>

Three criteria were initially used in identifying potentially misclassified accounts:

1. Any account with a unit number set at the single-family rate;
2. Accounts with a dwelling type of Condo/Townhome with no unit number set at the single-family rate; and
3. Review of Geographical Interface Service ("GIS") data, which contains county assessor's records, to identify conflicts between classification of dwelling types between the systems and resources.<sup>5</sup>

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<sup>2</sup> Additionally, between February and May 2025, NV Energy became aware that some affected customers did not receive their refund credits. NV Energy worked to correctly apply missing credits to these customers.

<sup>3</sup> Multiple departments were involved in NV Energy's review to ensure a thorough process, including New Business, Customer Billing and Information Technology.

<sup>4</sup> NV Energy discusses below its seven-year billing record retention policy.

<sup>5</sup> To review and analyze premises classifications, NV Energy also used robust querying tools, Google Maps, Google Earth, Gizmo, and iConnect, coupled with manual employee review. NV Energy's iConnect system is a GIS-based mapping tool used internally for visualizing NV Energy's infrastructure. A key function of iConnect includes,

The criteria included active and inactive accounts. Field reviews were also completed in situations where a determination could not be made from reviewing records. If the dwelling units had a common or shared wall with another unit, the team determined that the unit was part of a multi-family complex and was therefore eligible for the multi-family rate.<sup>6</sup> NV Energy's review team developed detailed spreadsheets to classify premises and track the scrubbing process involving the New Business Department for research and validation. A checklist ensured consistency in dwelling type identification through assessors' office data, NV Energy's iConnect system, and field visits (only when necessary). Accounts created after June 26, 2024, were excluded from corrections and assigned to the New Business Department for ongoing monitoring.

Review challenges included premises lacking unit numbers, townhouses classified as single-family despite sharing walls, and varying county definitions of dwelling types. This review was time-intensive and occurred over the course of several months.<sup>7</sup> The team also immediately identified and began implementing process improvements to prevent future misclassifications.<sup>8</sup>

NV Energy also reviewed available records regarding Rule 9 line extension allowance awards for impacted developments to determine if the misclassifications applied to this part of the new business process as well. This review identified eight multi-family complex developments for Nevada Power and three multi-family complex developments for Sierra where the customers were assigned an incorrect allowance due to misclassification.

## **2. Impacted Premises**

From NV Energy's review, it appears that misclassifications primarily occurred in two ways. First, when the multi-family rate was introduced in 2002, the Companies took steps to

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among other things, interactive mapping that allows users to zoom, pan, and search for specific locations or assets within NV Energy's service territory.

<sup>6</sup> Changes to how townhomes are treated under Rule 9 in 2024 introduced additional complexities to this analysis that are discussed in more detail in Section B(6) below.

<sup>7</sup> NV Energy's initial review began in June 2024 and was completed in December 2024. As discussed further below, a further investigation occurred in 2025 that identified other misclassified accounts. That review occurred from March through May 2025.

<sup>8</sup> For example, where the review team found incorrect dwelling types on some premises, they corrected these by integrating GIS data and adding a new dwelling type "TWNHSE" (Townhouse) to the system validation tables.

identify the premises that should be converted to the new classification, but it appears those efforts did not pick up all of the premises. Generally, the premises that were missed during the initial conversion were premises that did not include unit numbers in the address.

Second, misclassifications also occurred during premises creation when a residence or multi-family complex first entered NV Energy's systems. Because many of the impacted premises are multi-family complexes, with some complexes having hundreds of units, a single misclassified complex could result in numerous individual premises being misclassified, leading to a higher number of impacted individual customers. Additionally, multi-family complexes tend to have higher unit turnover, resulting in a compounding of the error for the impacted units because multiple customers could reside at the same premises during the time that the premises were misclassified. The review identified a set of multi-family residences that were incorrectly classified as single-family residences, but it also identified the inverse as well, single-family residences that were misclassified as multi-family residences.

The total number of impacted premises identified during the review from June to December 2024 is below:

	Misclassified Premises identified in 2024
Sierra	4,826
Nevada Power	17,275
Total	22,101

In addition, approximately 2,451 total premises were identified as single-family residences incorrectly billed on the multi-family rate schedule, resulting in an undercharge to these customers. NV Energy is not seeking repayment of those undercharges.

In March 2025, a customer informed NV Energy that neighbors in the same residential housing complex were still classified differently. NV Energy conducted a subsequent review and identified that some multi-family units that did not contain unit numbers in their address were missed in the initial review process described above. Additionally, some units remained

misclassified due to a data transmission error during the 2024 investigation. An additional review process was launched that identified approximately 20,000 additional multi-family premises as being misclassified. NV Energy worked to re-review its processes and ensure all accounts were properly coded. This process was completed in May 2025.

A table outlining total impacted premises is below:

	Additional Misclassified Premises identified in 2025
Sierra	1,127
Nevada Power	19,628
Total	20,755

The Companies have also identified certain premises that were billed under the single-family residential schedules that should have been billed under commercial rate schedules. Generally, these are meters that provide electricity to common areas of multi-family complexes, so they should be charged on the small commercial rate schedule. To date, the Companies have focused their review efforts on identifying and correcting misclassifications of multi-family residential premises, but will transition to identifying and correcting these small commercial premises once the multi-family premises review is completed.

Additionally, in reviewing a list of premises provided by Staff, the Companies identified some additional premises in Sierra's service territory that have been misclassified, but were not detected as part of the review in October 2024 or May 2025. NV Energy believes that these premises were missed in the earlier stages of the investigation because of an issue with the GIS land use data that was used. Updated GIS land use data is being obtained and NV Energy believes that once that data is available, a final scrub of the CIS data should identify the recently discovered misclassifications along with any other similarly situated misclassified premises that had not previously been discovered in the investigation. As discussed below in Section B(6) the Companies' review continues and does not include recently identified premises.

In the interest of transparency and to build stakeholder trust, NV Energy is in the process of retaining an external professional services firm to independently review and validate the

Companies' analysis and conclusions regarding the classification of residential customer accounts in Banner, its customer record management system. Its scope of work will include evaluating distinct processes used to identify miscategorized single-family and multi-family accounts, reviewing supporting documentation and management approvals, and conducting statistically significant testing. The focus of the engagement is to assess the completeness and accuracy of NV Energy's procedures and findings. This external firm will summarize its conclusions in a report that NV Energy will submit to the Commission. This engagement underscores NV Energy's commitment to transparency, accountability, and restoring confidence among its customers and stakeholders, and the Companies are committing internal and external resources to ensure all impacted customers are identified.

### **3. Analysis and Application of Rules**

As it was performing the initial investigation described above, NV Energy evaluated the appropriate way to provide a refund to affected customers. Historically, most customer refunds for an overcharge stem from a meter issue or an estimated bill. These types of refunds are addressed by Nevada Power's and Sierra's Rule 5(H), which requires the utility to calculate a refund for any overpayment to residential customers to the established date on which the error or omission commenced. However, Nevada Power's Rule 2 expressly addresses refunds for customers served on an inapplicable rate schedule, rather than a billing error or omission. Pursuant to Rule 2(K)(3), if a customer receives service under a rate schedule that is not applicable to the customer, the error is corrected by recalculating the customer's bills during the preceding six months to the lowest properly applicable rate schedule. Because this situation involved a misclassification at a rate that was not the "lowest properly applicable rate," the Companies initially determined that providing a refund for six months was the appropriate mechanism. While Sierra's rules do not include an analog to Nevada Power's Rule 2, NV Energy determined that in order to ensure that all customers were treated equitably, it would provide refunds using the same methodology in both Nevada Power's and Sierra's service territories.

#### 4. Initial Refunds Issued Pursuant to Rule 2

Based on this analysis, NV Energy used the six-month refund period for those customers living in a multi-family residence that were incorrectly categorized as single-family. For those customers living in a single-family residence that were mistakenly categorized as multi-family, who actually were paying less than they should have, NV Energy determined that it would not seek repayment.

After identifying the premises that had been impacted by the rate misclassification, NV Energy had to identify the customers that were owed a refund. The initial review and identification of the specific customers was completed around October 1, 2024. To calculate the amount of overcharges that should be refunded over the six-month period, NV Energy programmers calculated billing differences between April 2024 and October 2024 by comparing the amounts charged under incorrect single-family rates versus correct multi-family rates. The process included extracting billing data, recalculating charges at the correct rates, and determining monetary differences subject to refunds or credits per Nevada Power's Rule 2.

Preparing refunds (provided in the form of bill credits for current customers) and adjusting the rate class for impacted customers was synched up with the current billing cycle for each individual customer. Prior to the corrected bill arriving, each impacted customer was sent a letter informing them of the rate schedule error, the credit and the rate adjustment going forward. Communications and refunds were issued in December 2024. Prior to issuing the letters and refunds, NV Energy met with the Commission's Regulatory Operations Staff ("Staff") and informed it of the rate schedule misclassification issue and accompanying refund credits that would be provided.

The refunds addressed in December 2024 for the six-month period of April 2024 to October 2024 are identified below.

	Credits Provided
Sierra	\$289,181
Nevada Power	\$1,548,251
Total (December 2024)	\$1,837,433



Credits appeared as a total credit for charges and taxes on the customer's bill for each active impacted customer. Credits were applied to the customer's account balance, excluding any deposit balance. A separate itemization of each charge, tax, and total was sent to each customer with an explanation and detailed worksheet of the adjustment. Credits were also placed on inactive customer accounts. If the customer had another active account, the credit was transferred and applied to the active account. If there was no other active account, a refund check was created and sent to the last known address.<sup>9</sup>

Upon identifying the additional set of impacted premises in May 2025, NV Energy contacted Staff to provide notice that there would be additional credits issued to customers who were impacted by these newly identified misclassifications. NV Energy determined that this second set of customers should have been discovered in the initial process and should have received refunds in December 2024. The Companies provided these customers with credits for the same six-month period as the December 2024 set of customers (April to October 2024), plus a credit to address the additional months that the customer inadvertently remained on the wrong rate schedule. The refunds were provided to this second set of customers in late May 2025.

The amount of refunds given for this group of customers is as follows:

	Credits Provided
Sierra	\$147,907
Nevada Power	\$3,420,808
Total (May 2025)	\$3,568,716

The customers who received refunds in May 2025 were sent letters including the same information that was provided to the customers who received refunds in December 2024.

Between the December 2024 refunds and the May 2025 refunds, the Companies have refunded a total of \$5,406,149 to customers affected by the misclassification.

## 5. Cause of the Misclassification

In addition to identifying the misclassified multi-family premises in NV Energy's service territories, NV Energy's investigation also included a review and analysis of the cause of the

<sup>9</sup> Federal and State escheatment rules will be followed for any checks not cashed after the appropriate time period.

1 misclassifications. As noted above, the vast majority of misclassifications appear to be the result  
2 of either being missed in the initial conversion to the multi-family rates when they were  
3 introduced or human error when premises were entered into NV Energy's Banner CIS by  
4 designers. The rate classification selected at the time a premises is entered into the system  
5 generally determines the rate that is charged at the premises going forward. Additionally, failure  
6 to select the correct dwelling type can contribute to the issue, and has made it more difficult to  
7 screen premises to determine whether they have been classified on the correct rate schedule.

8 NV Energy has concluded that a significant contributing factor to these misclassifications  
9 was the absence of clear controls around accountability and ownership to ensure that as multi-  
10 family projects were completed, they received the proper rate classification and dwelling type  
11 designation based on the project design and builder allowance for the project. The lack of  
12 controls created conditions where misclassifications could persist and become embedded in the  
13 billing process. The Companies also lacked effective controls to detect and correct these  
14 misclassifications quickly.

15 In order to ensure that similar errors will not occur in the future, NV Energy has taken  
16 concrete steps to assign responsibility for the accuracy of rate classification and dwelling type  
17 designation going forward. Additionally, NV Energy has identified and implemented the  
18 following new controls to support this obligation.

19 a) Define and document internal procedures for verifying premises dwelling type and  
20 associated rate code.

21 To ensure correct classification and rate code assignment, designers will indicate the  
22 dwelling type for utility coordinator administrators on the design of new multi-family projects.  
23 The administrator will verify and document this using the meter set application. The Distribution  
24 Design Guidebook will be updated to formally include the checklist procedure for new Banner  
25 account creations. The corrective measure has been implemented.

26 b) Identify on design packets whether new townhome premises qualify as single-family  
27 under the 2024 Rule 9 update.  
28

1 Distribution Design will implement standardized language in the project purpose section  
2 to classify residential projects. Designers will use one of the following designations: Single-  
3 Family Detached Homes; Single-Family Attached Townhomes; or Multi-Family  
4 Apartment/Condo.

5 Due to the use of a different process in northern Nevada, an alternative mechanism to  
6 reduce risk has been developed. The Allowance Tab in Maximo, the Companies' asset  
7 management application, identifies the new rate for each meter set and is reviewed and approved  
8 by management, including townhomes qualifying as single-family under the 2024 Rule 9 update.  
9 The new standard communication template in Maximo ensures cross-checking with the  
10 Allowance Tab during Banner account creation. Identifying this on the design drawing is not  
11 effective for the northern process. These corrective measures have been implemented.

12 c) Creation of a permanent premises note indicating townhome status pre/post February  
13 2024 Rule 9 update.

14 A permanent premises note will be added in Banner to indicate townhome status before  
15 or after the February 2024 Rule 9 tariff update.

16 An additional review of new business contracts from the past five years was conducted  
17 to assess rate adjustments. It was found that automating account labeling could introduce errors  
18 due to varying construction timelines. This requirement will be updated through the automated  
19 process to ensure that such conditions are not overlooked.

20 d) Preserve email documentation to customers verifying the dwelling type and rate.

21 Emails verifying meter set information will be preserved. This corrective measure has  
22 been implemented.

23 e) Creation and management review of a weekly report on new premises created.

24 A meter set report will be generated bi-weekly and reviewed by leadership before  
25 customers receive their initial bill. This corrective measure has been implemented.

f) Implement a process to ensure review of new premises created.

Bi-weekly meetings between New Business and Billing will be held to discuss trends in premises creation and improve interdepartmental communication. These meetings will include review results, documentation of issues, and resolutions. This corrective measure has been implemented.

g) Adding a pop-up window in Banner to confirm the rate and dwelling assignment for mass premises creations.

A pop-up screen will be developed in Banner prompting users to confirm rate code and dwelling assignment during mass premises creation. This corrective measure has been implemented.

h) Create an automatic note showing when users have modified a rate in Banner, which will be periodically reviewed by the Billing Department.

An automatic note will be added to accounts when a rate code is modified. A report compiling these notes will be created for the Billing Department to review. This corrective measure has been implemented.

i) Create a new note type for accounts that have already been scrubbed.

A new note type will be developed to indicate that a Banner account has been scrubbed. A 10-year premises note will be added to all previously scrubbed accounts. This corrective measure has been implemented.

j) Investigate opportunities to either limit the ability to select a unit type without a corresponding unit number or create a pop-up reminder that the information is missing.

The Companies are developing a pop-up message in Banner to prompt users to input missing information before proceeding.

k) Investigate opportunities to prohibit premises creation without a dwelling type.

A key component of the corrective actions is the implementation of system controls aligned with County Assessor procedures, designed to accurately assign rates according to building and dwelling type in accordance with our tariffs. This automated approach aims to

1 minimize future misclassifications by removing manual processes and incorporating external  
2 data sources for verification purposes.

3 While preliminary corrective actions have been implemented. An external firm will help  
4 validate the effectiveness and appropriateness of the proposed controls.

## 5 **6. Review of Townhome Classifications Considering Rule 9 Change**

6 As noted above, NV Energy is continuing to review its processes to ensure all impacted  
7 premises have been identified. For example, NV Energy reviewed a specific subset of  
8 townhomes due to a 2024 change in the classification of new townhome units. Historically,  
9 townhome units have been classified as multi-family. At the direction of the Commission,  
10 townhomes had a change in classification from multi-family to single-family after February 2024  
11 where the townhome receives a single-family residential line extension allowance. On its face,  
12 the classification is easy: townhomes built before February 2024 are multi-family and  
13 townhomes built after February 2024 are single-family. However, there is some ambiguity  
14 around townhomes that signed a Rule 9 development agreement before February 2024, but  
15 customers did not occupy the units until after February 2024. In that scenario, there could be  
16 ambiguity between the designation made by the developer in the Rule 9 application and the  
17 proper rate classification under the tariff. The review team resolved this ambiguity by  
18 individually reviewing the townhome developments that meet this discrete timing criteria to  
19 ensure that the units received the correct classification. NV Energy completed this review in late  
20 August 2025, and the correction of accounts is in progress. The adjustments for this specific  
21 subset of townhome developments will not have a material impact on the refund projections  
22 because only a limited number of projects fit the timeframe.

## 23 **C. Methodology to Further Refund Affected Customers**

24 While NV Energy initially issued credits for affected customers to refund amounts over  
25 a six-month period consistent with NV Energy's Rule 2, the Companies believe that a more  
26 comprehensive refund mechanism would be appropriate. There is legal precedent that would set  
27 the refund period at the statute of limitations for four years.<sup>10</sup> However, as noted above, the

28 <sup>10</sup> *Sierra Pac. Power Co. v. Nye*, 80 Nev. 88, 95, 389 P.2d 387, 390-91 (1964).

Companies, in the interest of providing meaningful compensation to the customers who have been affected by misclassification of their multi-family residential premises as quickly as possible, propose providing refunds dating back to June 23, 2017, with interest.<sup>11</sup> The rationale for selecting the June 23, 2017, date is because the Companies' Corporate Records Management Policy provides for retention of customer billing records for seven years. Under this policy, customer billing records are purged from the Companies' system automatically after seven years. In the course of its investigation, NV Energy paused the removal of customer billing records, so currently customer billing records are available going back to June 23, 2017. NV Energy proposes providing refunds to customers affected by the misclassification of multi-family premises retroactive to June 23, 2017, so that the amount of the refund is based on the difference between what the billing records show each affected customer paid and what they would have paid had the premises received the correct classification. NV Energy also proposes to pay interest on these amounts at the same interest rate that is paid on customer deposits pursuant to Rule 13. This same methodology would be applied to any customers who have not been identified but may as the Companies continue their review of records.

Approximate total credit adjustment amounts for seven years are provided in the table below. While these numbers could fluctuate based on the exact timing of the credit issuance and the addition of any newly misclassified premises as discussed above, any changes should not be material.

*Approximate Total Adjustment, Customers and Premises for seven-year period*

	<b>Charge Adjustment</b>	<b>Tax Adjustment</b>	<b>Total Adjustment</b>
<b>Sierra</b>	\$5,509,536	\$260,761	\$5,770,297
<b>Nevada Power</b>	\$30,735,851	\$1,544,945	\$32,280,796
<b>Total</b>	\$36,245,387	\$1,805,706	\$38,051,093

The Companies also intend to include interest on these adjustments as determined by the Commission.

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<sup>11</sup> The Companies issued a directive to maintain customer billing records as soon as they became aware of the scope of the misclassification. Prior to June 23, 2024, the Companies believed that the misclassification affected a limited number of premises.

**D. Communication and Customer Interaction**

NV Energy's Corporate Communications prepared letters tailored to various account conditions to inform customers of rate corrections and credit adjustments, which included detailed explanations of credit calculations. Talking points were also developed for customer service agents to assist in explaining the changes to affected customers. NV Energy also intends to post frequently asked questions to its website to help customers better understand the refund process. Those likely FAQs include:

1. When will customers see the refund?
2. How will the refund be issued?
3. For those who moved out of state how will those refunds be issued? How can people contact NV Energy or provide their new out of state contact?
4. How long was this happening?
5. Why are you only paying seven years?
6. What is the total payout?

NV Energy appreciates the opportunity to provide information on this important issue in these Comments, and looks forward to participating in this investigatory docket.

Dated this 18th day of September 2025.

Respectfully submitted,

**NEVADA POWER COMPANY  
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**SIERRA PACIFIC POWER COMPANY  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing filing for **NEVADA POWER COMPANY D/B/A NV ENERGY AND SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY** in Docket 25-05010 upon the persons listed below by electronic mail:

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