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NEVADA CONSERVATION LEAGUE

Nevada Conservation League
PO Box 61378
Las Vegas, NV 89160

October 21, 2026

Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701

Re: Docket No. 26-05007 – NV Energy 2026 Integrated Resource Plan, Phase II

Dear Chair Williamson, Commissioner Cordova, and Commissioner Brown:

NV Energy is preparing to meet extraordinary growth in electricity demand, driven largely by data centers and AI, and the Commission has a critical role in ensuring the utility's plan protects customers and Nevada's energy future. Earlier this year, we submitted a broad letter[1] outlining priorities for this IRP, including affordability, clean energy, and careful scrutiny of load forecasts and new investments.

Phase II brings several of those issues into sharper focus. Decisions about customer programs, demand management, distributed energy resources, and large-load policies will help determine whether Nevada meets growing demand primarily by building more generation and infrastructure, or whether we better utilize resources already available in our homes, businesses, and communities. After reviewing testimony filed ahead of the Phase II hearing, we believe several areas deserve particular attention and action.

Nevada needs every available tool

Nevada is facing a scale and pace of potential load growth unlike anything the state has ever experienced before. Reliability is rightly front of mind for NV Energy and the Commission, and meeting that demand will require significant new generation. However it should not depend solely on building more supply. The programs considered in Phase II can also help meet Nevada's reliability needs while lowering bills, strengthening grid resilience, and reducing reliance on new gas generation.

Renewable energy and utility-scale storage will be critical. NCL raised these issues in our earlier comments and will engage further as the Commission considers supply-side resources in Phase III. But demand-side resources can also have significant system impacts when deployed at scale. Large customers driving much of the new demand can also help invest in these solutions.

Phase II is the opportunity to start building that scale now. These programs should not be treated as supplemental offerings at the margins of the IRP, but as resources that can grow alongside Nevada's demand. Investing now can lower costs for customers, build experience and participation, improve

[1] Initial Comments by Nevada Conservation League et al, filed August 13, 2026.

reliability, and reduce the amount of new generation, especially from expensive gas plants, needed in the years ahead.

Build a robust virtual power plant program

Virtual power plants (VPPs) offer one of the clearest examples of what a more flexible system could look like. Thousands of customer-owned devices can be coordinated to reduce demand or provide electricity when the grid needs it most.

Imagine a summer afternoon when temperatures are in the triple digits and electricity demand is approaching its peak. Instead of meeting every additional megawatt with new generation that may only run a few times a year, a VPP could coordinate thousands of resources at once. Batteries and electric school buses could discharge stored electricity, EV charging and water heating could shift to another time, and smart thermostats and other devices could temporarily reduce demand. Individually, these actions are small. Together, they can operate as a flexible, dispatchable grid resource.

There is agreement on this opportunity, but disagreement over what is needed to realize it. Intervenors argue that Nevada needs a defined VPP program with clear goals, participation pathways, fair compensation, and significantly greater scale.[2] In rebuttal, NV Energy argues that its existing demand-response programs, proposed grid-service tariffs, and planned distributed energy resource management system already provide the foundation for a VPP.[3]

A standalone VPP program would help coordinate and scale customer resources into a meaningful grid resource. NV Energy's plan proposes a demand reduction goal of 171 MW from 2027–2029, which VPP proponents argue[4] could be readily achieved, and potentially exceeded, through a robust VPP program. Testimony also recommends expanding NV Energy's residential battery target from 700 to 5,000 batteries to help achieve greater demand reductions.[5]

The Commission should use this IRP to establish a robust VPP program with bold targets, fair compensation, aggregation, and room to grow. Nevada already has significant untapped energy resources in homes and buildings that NV Energy could bring together through VPPs to help meet future electricity demand and protect customers from rising bills. Rather than continuing to rely on gas plants as the default solution, the Commission should ensure NV Energy is equally ambitious about managing demand as they are about building new supply.

Expand and Modernize Demand-Side Investment

The Large Customer Offsite Demand-Side Management (DSM) proposal[6] offers a new way to connect the customers driving Nevada's load growth with investments that reduce demand elsewhere on the

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[2] Testimonies of Kevin Lucas on behalf of Solar Energy Industries Association ("SEIA") and Solar United Neighbors ("SUN"), and Courtney Fieldman and Brian Turner on behalf of Advanced Energy United and Southwest Energy Efficiency Project, filed September 22, 2026.
[3] Rebuttal testimony of Michael O. Brown on behalf of NV Energy, filed October 6, 2026.
[4] Testimony of Courtney Fieldman on behalf of Advanced Energy United and Southwest Energy Efficiency Project, filed September 22, 2026.
[5] Testimony of Kevin Lucas on behalf of Solar Energy Industries Association ("SEIA") and Solar United Neighbors ("SUN"), filed September 22, 2026.
[6] Testimony of Courtney Fieldman on behalf of Advanced Energy United and Southwest Energy Efficiency Project, filed September 22, 2026.

system. Proposed by Google and supported by other intervenors, the program would allow large energy users to fund additional energy-efficiency and demand-side improvements for low- and moderate-income customers. In return, participating large customers would receive bill credits reflecting the demand reductions those investments produce. Programs like this could help ensure future data center development not only pays its own way but also delivers broader community benefits and supports Nevada's clean energy transition.

Tariffed on-bill financing addresses a different challenge: helping customers afford improvements in their own homes and businesses. The Nevada Clean Energy Fund (NCEF) has advocated for this approach[7] as a way to expand its existing Residential Energy Upgrade Program (RE-UP) and reach customers who may not be able to pay upfront or qualify for traditional financing. Improvements could be repaid over time through the utility bill, while NCEF could help connect customers with financing, grants, contractors, and other resources needed to complete projects. This could make weatherization, efficiency upgrades, distributed batteries, and other improvements accessible to many more customers.

These are two distinct, new programs that could significantly expand investment in demand-side resources. Large customers and other sponsors could bring new funding to the table, while on-bill financing could help turn that investment into projects in homes and businesses across Nevada. Each program could expand participation, reduce and shift demand, and bring more customer resources onto the grid.

These concepts should each move forward in this IRP with clear direction and an expedited path to implementation. Additional work will be needed to finalize program details, but that should not mean another open-ended process to determine whether or how to proceed. The Commission can establish the framework, expectations, and timelines now, with remaining details resolved quickly through implementation. With unprecedented load growth, Nevada should be scaling innovative ways to reduce and manage demand alongside investments in new generation.

Get Large-Load Policy Right

How Nevada serves unprecedented large-load growth will have significant implications for customers and the state's energy future. The proposed Large Load Energy Supply Agreement (LLESA) has drawn substantial attention, but the testimony reflects significant disagreement over the right approach. While the Commission can act here, several parties, including PUCN Staff, have indicated that these issues warrant further consideration in a separate proceeding. The need for a strong large-load framework, however, is clear, and all intervenors agree.

Whether through the LLESA, a large-load tariff, or another approach, Nevada needs clear guardrails that protect existing customers from increased costs, require large customers to bring clean energy to meet new demand, and avoid unnecessary reliance on new gas generation. These protections will be critical as the Commission determines how and under what terms NV Energy serves large loads.

[7] Comments by Nevada Clean Energy Fund, filed on June 17, 2026.

An opportunity to build the system Nevada will need

These proposals raise important questions about program design, cost recovery, customer protections, compensation, and implementation. Those details matter, but they should not become an excuse for delay. Given the scale of growth Nevada is facing, the Commission should use Phase II to set a clear direction and move promising programs toward implementation.

The Commission should:

- Establish a robust VPP program with meaningful targets, fair compensation, aggregation, and a pathway to scale.
- Approve and move quickly to implement offsite DSM and tariffed on-bill financing, including opportunities for large-load investment and NCEF participation.
- Establish strong large-load guardrails that protect existing customers, encourage clean energy investment, and limit unnecessary new gas generation.

Nevada will need both new supply and much greater investment in managing demand. Phase II is an opportunity to build that capacity now. The Commission should set the direction, establish clear timelines, and move these programs forward so they can grow at the pace Nevada's energy needs demand.

We urge the Commission to be ambitious in these unprecedented times. The programs being considered today may start small, but the infrastructure, rules, partnerships, and experience Nevada builds through them will be critical to meeting the state's energy needs for years to come.

Sincerely,

/s Christi Cabrera-Georgeson
Deputy Director
Nevada Conservation League