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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 their joint *2025-2044* Integrated Resource Plan, for the three-year Action Plan period 2025-2027, and the Energy Supply Plan period of 2025-2027.	)))))))	**Docket No. 24-05041**

Direct Testimony, Phase II

of

Deborah Kapiloff

on behalf of

Western Resource Advocates (WRA) & Sierra Club

October 4, 2024

SECTION 1

INTRODUCTION

1. Q: Please state your name, occupation, and business address.

A: My name is Deborah Kapiloff. I am the Transportation Electrification Policy Advisor for Western Resource Advocates ("WRA"). My business address is 1536 Wynkoop Street, Suite 500, Denver, CO 80202.

2. Q: Please describe your professional experience and education.

A: I have worked as WRA's Transportation Electrification Policy Advisor since June 2021. My qualifications are further detailed in Attachment 1. I advocate for policies which reduce emissions in the transportation sector, focusing on transportation electrification and the adoption of electric vehicles in all WRA's states. My policy work seeks to maximize the environmental and economic benefits of transportation electrification for communities across the West.

3. Q: On whose behalf are you testifying in this proceeding?

A: I am testifying on behalf of Western Resource Advocates (WRA) and Sierra Club.

4. Q: Please describe WRA.

A: WRA is a nonprofit conservation organization focused on protecting the Interior West's land, air, and water resources. WRA is a Colorado-based regional nonprofit conservation organization licensed to do business in Nevada. WRA's clean energy program works to advance plans and policies that lead to lower cost, more reliable, and cleaner energy resources. In Nevada, WRA, individually and as a member of Nevadans for Clean Affordable Reliable Energy, has participated actively in resource planning and rate case proceedings since 2006. WRA has worked to promote energy efficiency, increase the Company's renewable energy generation, and decrease our reliance on fossil fuel

generation to improve the state's air quality, and to limit the emissions of greenhouse gases and other pollutants.[1]

5. Q: Please describe Sierra Club.

A: Sierra Club is a national non-profit organization dedicated to the protection of the environment. Sierra Club has approximately 5,000 members in Nevada, many of whom are residential customers of NV Energy. Sierra Club works to promote renewable energy, energy efficiency, and clean transportation policies which reduce emissions of greenhouse gases and other air pollutants, reduce utility rates, protect public health, and create jobs. Sierra Club has intervened in numerous utility resource planning proceedings at the Nevada Public Utilities Commission, and in other dockets involving development of solar, energy efficiency, and EV programs.

6. Q: Have you previously testified before the Public Utilities Commission of Nevada ("the Commission")?

A: Yes. I provided testimony on the 2022-2024 Transportation Electrification Plan on behalf of NCARE-Sierra Club.[2]

7. Q: Have you previously testified before other public utilities commissions?

A: Yes, I have previously testified before the Utah Public Service Commission, the Colorado Public Utilities Commission, and the New Mexico Public Regulation Commission concerning electric utilities' transportation electrification programs, including the topics of electricity rate design, transportation electrification ("TE") program design and structure, rebate levels, and low-income programs, among other topics.

[1] See WRA's webpage, found at: https://westernresourceadvocates.org/.
[2] Docket No. 22-09006, NVE's Third Amendment to the 2021 IRP.

8. Q: What is the purpose of your testimony?

A: The purpose of my testimony is to review the Companies' proposed Transportation Electrification Plan and to recommend modifications consistent with best practices and the purpose and goals of SB 448. Based on my review, the proposed Plan fails to satisfy SB 448's objectives. My testimony explains how the Commission should direct NV Energy to move forward with a Plan that will adequately address customers' needs and accelerate transportation electrification consistent with SB 448.

9. Q: Please summarize your recommendations on behalf of WRA and Sierra Club.

A: My testimony finds that the overall scope of the Plan must be expanded to include additional programs to meet the statutory directive for transportation electrification plans. I recommend two possible approaches to accomplish this: Plan A and Plan B. Plan A recommends that the Commission require the Companies to refile this Plan, with a minimum budget of 26.2 million dollars dedicated to infrastructure and incentive programs. In the alternative, Plan B recommends that the Commission supplement the Plan with an additional 26.2-million-dollar budget to support infrastructure and incentive programs. In either Plan A or Plan B, the Commission should direct the Companies to make changes to the managed charging programs as described in this testimony.

For Plan A, I recommend that the Commission:

- Find that the Companies' proposed Plan does not meet the statutory objectives of SB 448 and direct the Companies to refile a Plan with a minimum budget of 26.2 million dollars. I recommend that the Commission require the revised Plan to include, at a minimum, the following elements:

- Residential Level 2 charger installation incentives for standard and low-income customers;
- EV purchase and lease rebates for low-income customers;
- Level 2 charger installation incentives for standard and income-qualified multifamily residences;
- Level 2 charger installation incentives for workplaces;
- Level 2 and direct current fast charger ("DCFC") charger installation incentives for fleets; and
- Level 2 and DCFC charger installation incentives for public use.

In the alternative—Plan B—I recommend that the Commission modify the Companies' Plan to include a $26.2 million budget for programs based on the incentives approved in the Electric Vehicle Infrastructure Development ("EVID") program. Specifically, I recommend that the Commission direct NVE to:

- Provide an incentive that is the lesser amount of $3,000 or 75% of total costs per port for workplace Level 2 chargers.
- Provide an incentive of $5,000 per port for Level 2 chargers in standard multifamily residences and $10,000 per port for qualified income multifamily residences.
- Provide an incentive of $500 to residential customers installing a Level 2 home charger.
- Provide an incentive of $2,500 to lower-income customers for the purchase or lease of an electric vehicle.

- Provide an incentive that is the lesser amount of $3,000 or 75% of total costs per port for public Level 2 chargers.
- Provide an incentive that is the lesser amount of $5,000 or 75% of total costs per port for fleet Level 2 chargers.
- Provide an incentive that is the lesser amount of $500 per kilowatt, up to $40,000 per charging station, or 50% of project costs for commercial customers installing direct current fast chargers.
- Approve a budget of at least $26.2 million for the additional program proposals and add these new programs to those laid out in the Company's application, as modified by my proposals.
- Allow customers participating in the proposed Residential, Workplace, Fleet, and Multifamily programs to choose to enroll in the relevant managed charging programs per the Companies' Plan.

- Concerning the Companies' managed charging programs, which would be applicable in either Plan A or Plan B, I recommend that the Commission:
  - Direct the Companies to share all available metrics on time of use ("TOU") load shifting in a future proceeding concerning TOU hours.
  - Direct the Companies to consider how an active managed charging pilot program and updated Electric Vehicle Recharge Period ("EVRR") TOU hours can shift charging into low-cost, high-renewable hours in a future TOU docket.

- Direct the Companies to modify managed charging programs so that notifications of events are delivered to any driver who is plugged in and allow drivers participating in all programs to override events.
- Establish a minimum managed charging participation period of 12 months rather than the 36 months proposed by the Companies.

10. Q: How is your testimony organized?

A: Section 1 of my testimony provides an introduction, Section 2 addresses the policy background governing transportation electrification plans and assesses the Plan's alignment with statutory directives, Section 3 addresses how stakeholders were consulted in the development of the Plan, and the performance of the Companies' other transportation electrification efforts. Section 4 is my analysis of Plan programs, Section 5 details my recommendations for how the Commission should proceed with this Plan, and Section 6 concludes my testimony.

11. Q: Are you sponsoring any attachments with this testimony?

A: Yes, I am sponsoring the following attachments:

- Attachment DK-1, Resume of Deborah Kapiloff.
- Attachment DK-2, WRA DR 3-3, NVE EV Disaggregation Analysis.
- Attachment DK-3: WRA DR 3-3, Analysis Summary
- Attachment DK-4: WRA DR 3-5
- Attachment DK-5: WRA DR 3-10
- Attachment DK-6: WRA DR 3-11
- Attachment DK-7: WRA DR 3-12
- Attachment DK-8: WRA DR 3-13

- Attachment DK-9: WRA DR 3-14
- Attachment DK-10: WRA DR 3-15
- Attachment DK-11: WRA DR 3-18
- Attachment DK-12: WRA DR 3-20
- Attachment DK-13: WRA DR 3-23
- Attachment DK-14: WRA DR 3-25
- Attachment DK-15: WRA DR 3-28
- Attachment DK-16: WRA DR 4-3
- Attachment DK-17: EVID Commercial Electric Vehicle Charging Station Incentives
- Attachment DK-18: EVID Lower Income Electric Vehicle Rebate
- Attachment DK-19: EVID Residential Electric Vehicle Charging Incentives

SECTION 2

Policy Context

12. Q: Please describe Nevada's greenhouse gas emissions reduction targets and how transportation contributes to greenhouse gas emissions in Nevada.

A: Nevada has goals to "achieve reductions in Nevada's net greenhouse gas emissions, relative to 2005 emissions, of 28 percent by the year 2025, 45 percent by the year 2030 and zero or near-zero emissions by the year 2050."[3] Senate Bill 448 explicitly states that "meeting these greenhouse gas emission goals will require substantial further reductions

[3] S.B. 448, 2021 Leg., 81st Reg. Sess. (Nev. 2021).

in Nevada's transportation sector emissions."[4] Since 2015, the transportation sector has been the greatest contributor to greenhouse gas emissions in Nevada and this trend is projected to continue through 2043.[5]

13. Q: Is Nevada projected to meet its greenhouse gas emissions reduction goals?

A: No. Net GHG emissions in 2025 are projected to be 24.5% below 2005 levels, net GHG emissions in 2030 are projected to be 27.8% below 2005 levels, and net GHG emissions in 2043 are projected to increase back up to 26.0% below 2005 levels.[6] Nevada is already missing its 2025 goal and as time goes on Nevada is expected to fall increasingly short of its emissions reduction goals.

14. Q: How does transportation factor into greenhouse gas emissions projections?

A: The Nevada Department of Environmental Protection states that:

"Beginning in 2022, emissions in the transportation sector are expected to largely remain static through 2043. This is due to increased emissions driven by population and vehicle demand, counterbalanced by decreased emissions driven by improvements in average fuel economy and increased market share of electric vehicles."[7] In short, policies which increase the market share of electric vehicles are one of the levers that Nevada has to reduce greenhouse gas emissions in the transportation sector. This context is essential to understanding the need for Transportation Electrification Plans and the need for strong policy to support transportation electrification in Nevada.

15. Q: What is the magnitude of investment in transportation electrification needed to achieve Nevada's climate goals?

[4] S.B. 448, 2021 Leg., 81st Reg. Sess. (Nev. 2021).
[5] Nevada Division of Environmental Protection 2023 Report, *found at*: ghg_report_2023.pdf (nv.gov), page 19.
[6] *Id.* pages 11-12.
[7] *Id.* page 12.

A: A number of studies have modeled the measures needed to achieve net-zero economy-wide emissions by 2050, consistent with Nevada's long-term goal. For example, Princeton University's Net Zero America study estimates that to meet the 2050 goal, we will need an estimated 450,000 light duty EVs on the road in Nevada by 2030, and 1.2 million EVs by 2035.[8] That is a significant increase from the approximately 40,000 EVs registered in Nevada in 2023. [9] Accordingly, investments in charging infrastructure, programs to support income-qualified customers and historically underserved communities, and utility programs to manage charging loads will also need to increase significantly.

16. Q: Should NVE, or any electric utility, be solely responsible for this investment?

A: No. But electric utilities have an important role to play in supporting transportation electrification. Specifically, a utility can develop programs to ensure access to charging infrastructure, particularly in certain underserved segments, and can develop managed charging programs that incentivize customers to charge at times that help integrate renewable energy and reduce peak demands. Managed charging further helps ensure that all ratepayers benefit from electric vehicles. Because these programs will need to expand over the next decade, it is valuable for the Companies to gain experience and expertise implementing them now.

17. Q: Please describe the statutory directive for transportation electrification plans.

[8] E. Larson, C. Greig, J. Jenkins, E. Mayfield, A. Pascale, C. Zhang, J. Drossman, R. Williams, S. Pacala, R. Socolow, EJ Baik, R. Birdsey, R. Duke, R. Jones, B. Haley, E. Leslie, K. Paustian , and A. Swan, Net Zero America: Potential Pathways, Infrastructure, and Impacts, Final report, Princeton University, Princeton, NJ, 29 October 2021. Data available at https://netzeroamerica.princeton.edu/.

[9] Alternative Fuels Data Center: TransAtlas, *found at*: https://afdc.energy.gov/transatlas#/?state=NV.

A: Senate Bill 448 ("SB 448)" requires investor-owned utilities to file transportation electrification plans "to accelerate transportation electrification"[10] and directs the Commission to consider whether plans achieve one or more of the following criteria in determining "whether to accept or to modify a [utility's] plan:

1. Improve the efficiency of the electric utility's electrical system, operational flexibility or system utilization during off-peak hours;
2. Improve the ability of the electric utility to integrate renewable energy resources which generate electricity on an intermittent basis into the transmission and distribution grid;
3. Reduce greenhouse gas emissions and air pollution;
4. Improve air quality in communities most affected by air pollution from the transportation sector;
5. Support increased consumer choice in electric vehicle charging and related infrastructure and services;
6. Increase access to the use of electricity as a transportation fuel by low-income users by including investments, incentives or programs for those users, or for entities operating in communities or at locations that will benefit low-income users;
7. Foster the investment of private capital in transportation electrification, and the demand for skilled jobs in related services; and
8. Provide information and education on the benefits of transportation electrification to customers."[11]

[10] S.B. 448, 2021 Leg., 81st Reg. Sess. (Nev. 2021).
[11] *Id.*

18. Q: Does SB 448 describe other factors the Commission should consider in considering transportation electrification plans?

A: Yes. In addition to the above, the legislation directs the Commission to consider "whether the proposed investments, incentives, rate designs, systems and programs provide electric services and pricing that customers value," "whether the proposed investments, incentives, systems and programs incorporate public reporting requirements which will serve to inform program design and Commission policy," and to consider "the cost to the customers of the electric utility to implement the plan."[12]

19. Q: What types of program offerings did SB 448 explicitly allow to be included in transportation electrification plans?

A: SB 448 states that the following programs may be included in transportation electrification plans:

"(a) Investments or incentives to facilitate the deployment of charging infrastructure and associated electrical equipment which supports transportation electrification across all customer classes including, without limitation, investments or incentives for residential charging infrastructure at single-family homes and multi-unit dwellings for both shared and assigned parking spaces;

(b) Investments or incentives to facilitate the electrification of public transit and publicly owned vehicle fleets;

(c) Investments or incentives to increase access to the use of electricity as a transportation fuel in historically underserved communities;

[12] *Id.*

(d) Rate designs, programs or management systems that encourage the charging of vehicles in a manner that supports the operation and optimal integration of transportation electrification into the electric grid, including, without limitation, proposed schedules necessary to implement the rate designs or programs; and

(e) Customer education and culturally competent and linguistically appropriate outreach programs that increase awareness of investments, incentives, rate designs and programs of the type listed in paragraphs (a) to (d), inclusive, and of the benefits of transportation electrification."[13]

20. Q: How did the Commission describe its efforts to evaluate the 2022-2024 Companies' Plan in relation to SB 448?

A: In its final order, the Commission stated that it "sought to effectuate legislative intent by continuing to appropriately incentivize the adoption of TE."[14] The Commission also referenced their understanding of the "legislative direction in SB 448 to incentivize the deployment of TE beyond current levels."[15]

21. Q: Have the Companies previously interpreted SB 448 in their 2022-2024 TEP filing?

A: Yes. The Companies stated that "SB448 explicitly directs NV Energy to increase access to the use of electricity as a transportation fuel in [historically underserved communities]. NV Energy opines that customers cannot access this fuel if they cannot access the vehicles."[16] Furthermore, the Companies stated that the TEPs represent a "unique situation as NV Energy was directed to implement a plan to accelerate transportation

[13] *Id.*
[14] Docket No. 22-09006, Order Issued March 24, 2023, page 109.
[15] *Id.*, page 118.
[16] *Id.*, page 100.

electrification in Nevada – not just to facilitate normal and expected increased load."[17] It is clear that in the 2022-2024 Plan, the Companies understood that the legislative direction of SB448 meant a TEP should go beyond supporting existing EV load, with specific attention given to HUCs and low-income customers.

22. Q: Does the Companies' 2025-2027 Plan filing reflect the TEP's primary legislated goal of accelerating transportation electrification?

A: No. The Companies' filing largely focuses on managing load expected from transportation electrification, as opposed to proposing programs which would increase the adoption of electrified transportation among the Companies' customers. The Companies' filing includes only two programs (the Qualified Income Multifamily Charging Infrastructure Build Program and Transit Electrification Grants) which provide incentives to deploy additional charging infrastructure, and their respective scopes are limited.

23. Q: Do you believe the Companies' Plan meets the statutory requirements of SB 448?

A: No. As elucidated by the Commission's understanding of SB448 and the Companies' own previous statutory interpretation, a TEP must actively incentivize additional transportation electrification per SB448's statutory language. The Companies' proposed Plan does not accomplish that.

24. Q: Does the Companies' Plan meet statutory objectives to reduce greenhouse gas emissions and improve air quality in communities most impacted by the transportation sector?

A: No. While the Companies have proposed an infrastructure incentive program for low-income multifamily housing residents and $3 million in transit electrification grants, the

[17] *Id.*, page 104.

Plan's total investment in programs which target the communities most impacted by the transportation sector is negligible. Given this, the reductions in greenhouse gas emissions and improvements in air quality in those communities will be de minimis.

25. Q: Does the Companies' Plan meet the statutory objectives to support increased customer choice in EV charging, and increase access to the use of electricity as a transportation fuel by low-income users?

A: No. The proposed managed charging programs will not increase customer choice in EV charging, as the programs will not encourage additional charging deployment at residences, workplaces, for fleets, or in public places. Furthermore, aside from the small investments in multifamily housing charging infrastructure and transit electrification, the Companies' Plan will not increase low-income users' access to the use of electricity as a transportation fuel.

26. Q: Does the Companies' Plan meet the statutory objective to foster the investment of private capital in transportation electrification?

A: No. The managed charging programs' incentives are insufficient to encourage private capital investment into either electric vehicles or charging infrastructure. The qualified income multifamily program is unlikely to foster investment based on flaws within its program design which make uptake by multifamily residences unlikely.

27. Q: Does the Companies' Plan meet certain statutory objectives related to efficiency and integration of renewables?

A: Yes. The Plan's managed charging programs and School Bus V2G tariff meet the statutory objectives of improving the efficiency of the electric utility's electrical system and improving the ability of the electric utility to integrate renewable energy resources.

Additionally, the Dealer Partner Program meets the statutory objective to provide information and education on the benefits of transportation electrification to customers.

28. Q: Does the inclusion of programs meeting certain statutory objectives make the Plan sufficient?

A: No. Meeting some statutory objectives does not make the Companies' proposed Plan sufficient as the Plan does not fulfill the Legislature's intended overall purpose that TEPs accelerate transportation electrification. While SB 448 does not require the Companies' Plan to meet every statutory objective, it does explicitly require a Plan that accelerates transportation electrification. As such, a Plan that fulfills certain statutory objectives but does not meaningfully accelerate transportation electrification is not sufficient under SB 448.

SECTION 3

Plan Development, Stakeholder Engagement, and TEP Performance

29. Q: Please describe the topics you address in this section.

A: In this section, I discuss how the Companies failed to perform meaningful stakeholder engagement in the development of the TEP and how the Companies did not include customer insights from surveys and past programs in the development of this Plan. I also address the status of the Economic Recovery Transportation Electrification Plan and the 2022-2024 TEP.

30. Q: Did you participate in the Companies' stakeholder group?

A: Yes. I was a participant in the Companies' stakeholder group on behalf of WRA.

31. Q: Did you find the stakeholder group to be a meaningful venue for providing input on the development of the 2025-2027 TEP?

A: No. The Companies did not share detailed information regarding what they intended to file for this Plan in a timely manner for stakeholders to provide input that the Companies could use to alter their Plan. By the time the Companies shared details on the Plan, the Companies' filing deadline was approaching and they were not amenable to making significant changes to their proposal. Contemplated Plan programs were first shared with stakeholders on the March 19, 2024, meeting and additional details were shared on the May 14, 2024 meeting.[18] By the time the Companies had shared substantive information about their Plan in May, the filing deadline was two weeks away.

32. Q: Did WRA endeavor to meet with the Companies regarding the development of the 2025-2027 TEP?

A: Yes. WRA met with the Companies in January, March, and April of 2024. WRA shared recommendations on programmatic content and details and sought to provide the Companies with resources to craft a strong Plan.

33. Q: Did the Companies have valuable sources of information available for consideration in developing the Plan?

A: Yes. The Companies conducted customer surveys in 2022 and 2024 regarding transportation electrification. Additionally, the Companies have information from past programs, including the Electric Vehicle Infrastructure Development program, the Economic Recovery Transportation Electrification Plan, and the 2022-2024 Transportation Electrification Plan. I describe the findings from each of these sources of information, in order.

[18] Volume 22, TEP-2, starting on page 79.

34. Q: Did the Companies use this information to inform a meaningful set of programs and measures?

A: No. The Companies failed to incorporate valuable customer insight and preferences from the 2022 survey and did not target customer groups well enough to derive the maximum value from the 2024 survey. The Companies also failed to incorporate takeaways from previous transportation electrification programs. The result is a set of proposals in this case that are not well aligned with customer interests.

35. Q: Please describe the methodology and findings of the Companies' 2022 residential customer EV survey.

A: In 2022, the Companies conducted a survey of 797 residential customers, living in both single-family and multifamily residences, about their attitudes towards EVs and potential program offerings.[19] The survey found that:

- 40% of respondents were likely to purchase an EV as their next vehicle, up from 24% in 2020.
- Access to workplace charging, access to public chargers near home, access to public chargers on typical travel routes, and access to a charger at home increased the percentage of respondents likely to purchase an EV as their next vehicle from 40% to 58-63%.
- In a change from the 2020 survey results, household income no longer was a statistically significant predictor of EV adoption likelihood.

[19] Residential Customer EV Survey 2022 NV Energy April 15, 2022 *found at:* https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/cleanenergy/ertep/Residential-Customer-EV-Survey.pdf.

- 50% of respondents said a lower purchase or lease cost would make them more likely to acquire an EV, 46% said the ability to charge at home would encourage them, and 35% and 22%, respectively, indicated that more public chargers and the ability to charge at work would make them more likely to acquire EVs.

36. Q: Did the 2022 survey analysis consider how the Companies could influence these factors and make more customers likely to acquire EVs?

A. Yes. The survey analysis states that the Companies could influence EV acquisition by offering support to offset EV purchase cost, and providing support for Level 2 home charging, public charging, and workplace charging. The survey's key findings and recommendations also state that the continuation of support for public and workplace charging will be especially important in helping multifamily residents adopt EVs.

37. Q: Do you think the 2022 survey generated valuable customer insights which the Companies could have used to inform their Plan development?

A: Yes. The 2022 survey illustrated that lower vehicle purchase price, access to charging in convenient locations, like home and workplace charging, and additional public charging, would all increase the likelihood of customers purchasing EVs.

38. Q: Please describe the survey that the Companies conducted in 2024.

A: The Companies carried out a web survey of residential customers from January 30, 2024, to February 20, 2024. One of the research objectives of the survey was to "provide customer insights to support the 2024 IRP filing."[20]

39. Q: Please list the programs presented for consideration in the 2024 survey.

A: The survey presented seven programs to customers. They are as follows:

[20] Volume 22, TEP-3 page 3 of 43.

- Turnkey - In this program, NV Energy would provide a turnkey solution to make it easy for residential customers to charge their electric vehicle at home. The program would cover the full cost of an installed level 2 electric vehicle charger. This would also include the cost of electrical upgrades in the home, if required. In exchange, customers would be automatically enrolled into a managed charging program.
- Managed Charging - In this program, residential customers that already have a compatible level 2 charger would be able to enroll into a managed charging program. A compatible charger can communicate with NV Energy to receive control signals. Upon enrollment into the managed charging program, participants would receive a one-time upfront payment of $200, and then an ongoing incentive of $50 per year.
- TOU Rate - In this program, residential customers would be able to save money while charging their electric vehicle by switching to a time-of-use rate. The time-of-use rate would have a significantly lower cost for charging during specific times of the day. Typically, this would be during the midafternoon when solar energy is abundant, as well as during the very early morning hours when energy demand is low. Customers would receive an additional discount on their rate by agreeing to participate in managed charging events. Customers would also receive a $200 rebate for installing a compatible level 2 charger. NV Energy would provide technical assistance to help customers program their charger or car to save the most money on the time-of-use rate.
- Away From Home - In this program, NV Energy would provide service that allows residential customers to charge electric vehicles away from home across multiple

charging networks and charging locations without having to sign up for an individual account with each of the different participating vendors. NV Energy would then bill customers for this away from home charging on their monthly electric bill. The service would come with a downloadable smartphone application to find available electric vehicle chargers, and to keep track of charging costs. In return, residential customers would automatically be enrolled in a managed charging program.

- Employer Charging - In this program, NV Energy would work with employers to help them install charging infrastructure in their employee parking lots to make it easier for residential customers to charge at work. In return for this assistance, the workplace chargers would participate in managed charging events.
- Multifamily Level 3 Charging - In this program, NV Energy would provide assistance to multi-family property owners (apartments, condominiums, town home communities) to help them install level 3 charging equipment that can charge an electric vehicle from 0 percent to 80 percent in 30 minutes. This program would help multi-family property owners offer convenient fast charging to multiple tenants in an efficient and flexible manner. In return for this assistance, the fast chargers would participate in managed charging events.
- Income-Qualified - In this program, NV Energy would partner with the Nevada Clean Energy Fund to offer a loan assistance program to help income-qualified customers purchase a new or used electric vehicle. This program would be offered to income-qualified customers, as defined by Senate Bill 448. NV Energy would

help the customers identify and access electric vehicle chargers. In return for this assistance, customers would be enrolled in a managed charging program.

40. Q: Do you believe the Companies targeted an appropriate group of customers for the 2024 survey?

A: No. The Companies surveyed three groups of customers; customers with EVs who had previously participated in TOU or other EV programs, customers with EVs who had not participated in any of the Companies' programs, and customers who reside in multifamily housing, are low-income, and do not have EVs. Missing from these groups of customers surveyed are customers who do not have EVs who reside in single-family housing and customers without EVs who are not low-income and live in multifamily housing. Given that the TEP is intended to "accelerate transportation electrification," targeting only current EV owners and a small segment of non-EV owners does not represent an attempt to understand how the Companies could design a plan to help additional customers pursue transportation electrification.[21] The omission of key customer segments is made evident by the survey results, such as the low interest in the turnkey offering, which is attributed to the program being "not particularly relevant to current single-family home EV owners - those customers already have installed home charging and/or made electric upgrades to their home, if needed."[22] The survey takeaways further state that the turnkey program would "likely have higher appeal among customers known to be EV Intenders (in the market for an EV in next few months)," although these customers were not included in the survey.[23] This skews the survey results, leading to less demonstrated interest in

[21] S.B. 448, 2021 Leg., 81st Reg. Sess. (Nev. 2021).
[22] Volume 22 TEP-3, page 9 of 43.
[23] *Id.*

programs of less relevance to current EV owners. However, certain survey takeaways are valuable and could have been used to inform the Plan development.

41. Q: Did the 2024 survey generate some valuable customer insights which the Companies could have used to inform their Plan development?

A: Yes, the following insights from the 2024 survey provide value in guiding the Plan:

- In response to the Income-Qualified program, nearly half of customers surveyed stated they would be likely to enroll.[24] Additionally, customers identified assistance purchasing an EV as something they liked about the program.[25]
- Current EV drivers had a favorable view of TOU rates and managed charging, but had concerns about losing control over the charging process.[26]
- Employer charging was the highest ranked program, indicating a strong interest in a workplace charging program.[27]
- The Multifamily Level 3 charging scored the highest among program offerings for multifamily low-income residents.[28] 57% of respondents said they would be likely to enroll, but respondents also noted that Level 2 charging could be more appropriate for the multifamily use case.[29]

42. Q: Were stakeholders able to provide feedback on the 2024 survey's sample groups and the questions customers were asked?

[24] *Id.*, page 8 of 43
[25] *Id.*, page 8 of 43
[26] *Id.*, page 7 of 43.
[27] *Id.*, page 7 of 43.
[28] *Id.*, page 8 of 43.
[29] *Id.*, page 8 of 43.

A: No. Information on the survey was only shared with stakeholders after the survey had already been conducted. The Companies did not seek feedback from the stakeholder group during the survey development process.

43. Q: Would you have appreciated the opportunity to provide input on the 2024 survey design and the customer sample groups?

A: Yes, I have concerns with the way the survey was conducted and would have certainly shared these concerns with the Companies prior to the survey being conducted if such an opportunity had been made available.

44. Q: Do you believe the Companies adequately incorporated insights from the 2022 and 2024 surveys into the Plan that was filed?

A: No. The following elements of the Plan make clear that the survey findings did not guide the Plan:

- The Plan does not include any offerings that help low-income customers purchase or lease electric vehicles, such as a loan assistance program or direct financial support through a rebate program.
- The Plan has no offerings which include meaningful incentives for residential charging.
- The Plan has no offerings which include meaningful incentives for public charging.
- The Plan's managed charging offerings do not address customer concerns about relinquishing control over their charging schedule. I address the flaws in the Managed Charging programs in more detail later in my testimony.
- The Plan does not present a robust workplace charging offering, instead offering the Workplace Managed Charging Build program, which consists of paltry managed

charging incentives for a maximum of 664 total ports. The incentives in the Workplace Managed Charging Build program are far too low to meaningfully incentivize the deployment of additional workplace charging.

45. Q: Please briefly describe the Electric Vehicle Infrastructure Development program, the Economic Recovery Transportation Electrification Plan, and the 2022-2024 Transportation Electrification Plan.

A: The Electric Vehicle Infrastructure Development Plan authorized investment of up to $15 million in charging infrastructure and EV purchase incentives from 2019-2023. The Economic Recovery Transportation Electrification Plan directed the Companies to invest up to $100 million in charging infrastructure, with a focus on interstate corridors, urban areas, public agencies, outdoor recreation and tourism sites, transit, and school buses from 2022-2024. The 2022-2024 TEP resulted in $56 million of approved investment, with programs for interstate corridor and electric school bus charging.[30]

46. Q: Are there specific insights you would like to point to from these programs?

A: Yes. I will begin with the Electric Vehicle Infrastructure Development program ("EVID"). The EVID program's funds were entirely reserved, supporting charging infrastructure installation for multi-family, workplace, government, single-family residential, fleet, government, and public facility use cases.[31] Additionally, EVID's Lower Income EV Rebate Program, which provided $2,500 for the purchase of a new or used EV, was claimed by participants with annual household incomes between $8,698 and $57,718.[32]

47. Q: Please expand on the types of support that EVID provided.

[30] 22-09006, Compliance Filing filed on April 24, 2023, page 3.
[31] Docket No. 23-02006, Volume 2, Technical App. F.8, page 122 of pdf.
[32] *Id.*, page 123 of pdf.

A: EVID offered varying rebate levels for infrastructure on a per-port basis, supporting infrastructure deployment. In the 2021-2023 period, EVID paid out incentives for over 250 multifamily ports, 28 workplace ports, over 60 fleet ports, 101 ports at public facilities, and additional support for ports at residential single-family homes, government facilities, and other use cases.[33]

48. Q: Did EVID successfully deploy charging infrastructure across a wide range of segments?

A: Yes. EVID provided incentives in each of the programs it offered and concluded when funding was fully reserved. The program demonstrated that well-constructed programs can achieve significant uptake in the Companies' service territories.

49. Q: Has the Economic Recovery Transportation Electrification Plan ("ERTEP") resulted in significant investment in charging infrastructure thus far?

A: No. Despite the most recent annual report stating that 21 sites with 435 chargers had been reserved[34] only two of these sites have completed construction as of the Q2 2024 report.[35] The Companies have also recently removed the utility ownership option from the Interstate Corridor Charging Depot, Urban Charging Depot, Public Agency and Outdoor Recreation programs, limiting the options interested customers have to install infrastructure.[36] The Companies have spent a total of $4,754,233, with over 90% of spending ($4,326,125) on program administration, which has not resulted in the installation of charging infrastructure.[37] The Companies have spent $0 on the Interstate

[33] Docket No. 24-02001 Volume 1, page 35.
[34] *Id.*, page 12.
[35] Docket No. 24-01015, Compliance filing filed on August 14, 2024. ERTEP Q2 2024 report.
[36] *Id.*, page 6.
[37] *Id.*, page 10.

Corridor Charging Depot, Urban Charging Depot, and Outdoor Recreation and Tourism programs.[38] The funding for this program expires on December 31, 2024, leaving major questions about how effective it will be in deploying charging infrastructure. The results of ERTEP have been highly disappointing given the Companies' assertion that "all charging stations supported through ERTEP are anticipated to be online by 2024."[39]

50. Q: In the 2023 ERTEP annual report, did the Companies acknowledge that the site profile requirements for programs resulted in lower customer interest?

A: Yes. The Companies state that for the pre-determined site profiles' "the set nature of these profiles have limited the customers interested in participating in the program."[40]

51. Q: Please describe the 2022-2024 TEP, as proposed by the Companies and as approved by the Commission.

A: The Companies proposed a $348-million-dollar TEP for 2022-2024. The proposed plan included programs for a low-income EV rebate, as well as incentive and infrastructure programs for single-family housing, multi-family housing, workplaces, interstate corridors, urban depots, fleets, transit agencies, and school districts. The Commission approved the interstate charging and electric school bus components of the plan.[41] The Commission stated that the other programs were rejected in part due to "the lack of evidentiary support for some of the programs and for the overall budget of $348 million."[42]

[38] *Id.*
[39] ERTEP Frequently Asked Questions, *found at*: https://www.nvenergy.com/cleanenergy/ertep/faqs.
[40] Docket No. 24-01015, Compliance filing filed on August 14, 2024. ERTEP Q2 2024 report, page 6.
[41] Docket No. 22-09006, Final Order issued on March 24, 2023, page 110.
[42] *Id.*

52. Q: Has the 2022-2024 TEP been successful in deploying funds to develop charging infrastructure for its approved programs?

A: No. The Companies stated that over $15 million had been reserved for infrastructure, but as of late July 2024, none of that has been expended.[43] Thus far, the Companies have only spent money on program administration.[44] Currently, no funds are reserved for the Interstate Corridor Charging Program and five of the ten targeted sites have had no customer interest form submitted or have been cancelled.[45]

53. Q: Do you think the Companies have incorporated lessons learned from past programs and customer surveys into this Plan?

A: No. I am disappointed to see that the Companies described lessons learned and insights in annual reports and survey analyses but failed to incorporate those findings into this Plan.

54. Q: What is your overall impression of the programs proposed in this Plan?

A: My overall impression of the programs proposed in this Plan is that they are poorly constructed, with little thought given to programmatic details and the needs of the customers the programs are intended to serve. It is unfortunate that the Plan does not incorporate the myriad takeaways directly from customer surveys and the Companies' own prior experience with ERTEP, EVID, and the 2022-2024 TEP in this Plan's contents. I believe this Plan falls short of the Legislature's statutory intent for TEPs and could have been improved if the Companies had adequately synthesized takeaways from their past and current programs and customer surveys, as well as proactively engaged stakeholders in a timely manner on the Plan's contents.

[43] Response to WRA DR 3-28.
[44] Volume 20, TEP Table 36.
[45] Volume 20, page 296 of 304.

55. Q: Given the Companies' recent challenges deploying transportation electrification programs, do you support their investment in transportation electrification in general?

A: Yes. The Company has a unique ability to develop and deploy programs that can enhance the customer's experience, the environmental benefits of transportation electrification, and the financial benefits to all the Companies' customers, if charging is managed. This, combined with the magnitude of investment in transportation electrification that is needed, warrants the Company's investments and programming in transportation electrification. Furthermore, the Companies are legislatively mandated to file transportation electrification plans.

56. Q: Recognizing that you are not a lawyer, in your opinion does the Commission have a sufficient basis to direct the Companies to refile or modify this Plan?

A: Yes. Given the shortcomings in the Companies' TEP filing in this application, and the fact that this is the second attempt at filing a sufficient TEP, my opinion is that the Commission has a sufficient basis to proactively direct the Companies to refile of modify this plan to effectuate the legislative intent driving it.

SECTION 4

Analysis of Plan Programs

57. Q: Please describe the topics you address in this section of testimony.

A: In this section of testimony, I address programs the Companies have proposed in this Plan. I provide testimony on the Rule 9 Allowance Adjustment, Residential Managed Charging Build Program, Qualified Income Multifamily Charging Infrastructure Build Program,

Workplace Managed Charging Build Program and the Fleet Managed Charging Build Program.

58. Q: Please describe the Rule 9 Allowance Adjustment modifications proposed in the Plan.

A: The Companies propose to make up to 100% of the Commercial EV Allowance Adder available to certain commercial customers upfront.

59. Q: Will the Rule 9 Allowance Adjustment modifications apply to the deployment of most commercial public charging?

A: No. The Rule 9 Allowance Adjustment modification disallows charging stations which charge customers for charging from receiving 100% of the Estimated Demand Based Allowance upfront through the Rule 9 Allowance Adjustment.[46] This means that public DCFC and Level 2 chargers are ineligible unless they dispense free electricity.[47]

60. Q: Do you think the Rule 9 Allowance is an effective policy to encourage the deployment of charging infrastructure?

A: No. From 2022 to date, the Companies issued Rule 9 EV Allowance Adders to only 275 single-family residential customers and 2 multifamily customers.[48] To contextualize this, from 2022 to the end of 2023, light-duty EV adoption in Nevada grew from 32,900[49] to 44,060 vehicles.[50] The Rule 9 EV Allowance Adder is not a substitute for an infrastructure or infrastructure incentive program given its low level of support for EV charging deployment and the limited circumstances it is applicable in.

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[46] Response to WRA DR 4-3.
[47] Response to WRA DR 4-3.
[48] Response to WRA DR 3-10.
[49] Alternative Fuels Data Center: TransAtlas, *found at*: https://afdc.energy.gov/transatlas#/?state=NV.
[50] Alternative Fuels Data Center: Maps and Data - Electric Vehicle Registrations by State, *found at*: https://afdc.energy.gov/data/10962.

61. Q: Do you think it is necessary to supplement the Rule 9 Allowance with incentive programs for charging infrastructure?

A: Yes. I propose infrastructure incentives in Section 5 of my testimony.

62. Q: Turning now to the Residential Managed Charging Build Program, please describe the Companies' overall approach to managed charging programs in the Plan.

A: The Companies' approach to managed charging programs is to center managed charging around demand response events, of which the Companies anticipate about 40 per year.[51] The Companies anticipate the events will last for about two hours and participating customers will be notified one day in advance.[52] The Companies will reduce charging load with a "throttle down of the charging equipment" at levels "from 10 to 50 percent on average."[53] The Companies propose a layered approach, with time of use rates and the managed charging programs working jointly to create incentives for load shifting. The Companies also require a 36-month minimum participation in their managed charging programs.

63. Q: Please describe the rationale for the Companies' approach to managed charging.

A: The Companies state that "as EV adoption grows, it will be critical to improve the system load factor by moving EV charging off-peak and to times when electricity production from renewable sources is significant or at risk of curtailment."[54] Managed charging programs' events are triggered in instances of "economic events, reliability events, emergency events, and local distribution system demand limiting events."[55] The

[51] Volume 20, page 272.
[52] Volume 20, page 273.
[53] Volume 20, page 273.
[54] Volume 20 page 270.
[55] Volume 20, page 271.

Company states that the managed charging program will be "layered on top of the tariff-based TOU rates to provide a more dynamic operational flexibility."[56]

64. Q: Do current EV drivers regularly charge during on-peak times?

A: Yes. Per the Companies' load disaggregation study of 2,344 EV drivers in the Las Vegas area, 94% charged, to some extent, during on-peak hours.[57] Sixty-five percent of EV drivers did 10% or more of their EV charging during on-peak hours and the average percentage of total EV charging occurring during on-peak hours was 21%.[58] The study identified 113,102 kWh/month total load shifting potential from the identified EV drivers' off-peak charging.[59] While it is unclear how many of these drivers are on a time of use rate, or how their load could be shifted by enrollment on a time of use rate, the study does indicate that on-peak charging is a regular behavior among EV drivers.

65. Q: Is EV load flexible and adaptable to load shifting?

A: Yes. The Companies' load disaggregation found that the average charging duration was 3.1 hours.[60] Given the long dwell times of many vehicles, especially at residences, workplaces, and fleet depots, EV load is overall well suited to load shifting.

66. Q: Is there existing data on the efficacy of the Companies' EVRR TOU efforts?

A: The Companies state that:

"The Companies' vendor offers out-of-the-box reporting dashboards that are updated daily and allow the tracking of customer engagement metrics, and the amount of load shift achieved through the transition to the TOU rate and coaching. All metrics can be

[56] Response to WRA DR 3-13.
[57] Response to WRA DR 3-3.
[58] *Id.*
[59] *Id.*
[60] *Id.*

downloaded from the dashboard in CSV and PDF format. This allows the Companies to share this data with the Commission if needed."[61]

However, there is no publicly available data on the amount of load shifting that has occurred because of customer participation in TOU rates. As such, I recommend that the Commission direct the Companies to share all available metrics on TOU load shifting in a future proceeding. WRA and Commission Staff have both previously recommended that the Commission open a TOU investigatory docket.[62] An examination of the current EVRR rate schedules and investigation into the most ideal on- and off-peak windows to maximize load shifting benefits from managed charging could also be conducted in such a docket.

67. Q: How should the Electric Vehicle Recharge Rider – Time of Use ("EVRR-TOU") rate interact with managed charging programs?

A: The EVRR-TOU rate should offer foundational price signals through time-varying rates on the lowest cost hours for EV charging to occur. However, given the increasingly dynamic nature of the cost and emissions intensity of resources, active managed charging can be layered on top to provide further optimized charging schedules. I recommend that the Commission direct the Companies to consider how an active managed charging pilot program and updated EVRR time of use hours can shift charging into low-cost, low-emission and high-renewable hours in a future TOU docket.

68. Q: Do the Companies have any information on what type of managed charging customers prefer?

[61] *Id.*.
[62] Docket No. 24-02026, Emily Walsh (NCARE) Prepared Direct Testimony, page 58, Q&A 69.

A: Yes. The 2022 residential customer survey included a question about when customers would shift their charging behavior in exchange for a financial incentive. Fifty-seven percent of respondents stated they would shift charging behavior for a discounted cost for charging during utility preferred hours, 44% would do so for rewards based on the percentage of charging that occurs during utility preferred hours, and 34% would avoid charging during specific events throughout the year.[63] When asked which program they would most prefer, only 12% of respondents selected rewards for avoiding charging during specific events.[64] This indicates that customers do not favor event-oriented managed charging and are hesitant to accommodate this approach, even for a financial incentive.

69. Q: Why do you think throttling of charging is a suboptimal method for reducing charging demand?

A: Throttling of charging, as proposed by the Companies, does not maximize reductions in charging demand. The proposal by the Companies may only lower the charging demand by 10%, in the case of a 10% 'throttle down' of charging equipment. In the most ambitious scenario presented in the Companies' application, the 'throttle down' would reduce charging demand by half. Additionally, in the Companies' proposal, customers do not have control over the throttle level. As such, a customer opting in to a managed charging event might be amenable to delaying their charging entirely until after the event has passed or reducing their charging demand by a factor greater than 50%, but the Companies do not present them these options with the current program design. Moreover,

[63] Residential Customer EV Survey 2022 NV Energy April 15, 2022, *found at*: https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/cleanenergy/ertep/Residential-Customer-EV-Survey.pdf.
[64] *Id.*

the Companies' intention to apply a blanket throttling percentage for each customer class entirely ignores the fact that customers' needs differ based on changing individual circumstances. For instance, a customer may need their vehicle to be charged to a certain percentage by a certain time to accommodate travel, and as such, might not be willing to participate in the default throttle rate for their customer class, but could be willing to participate in a lower throttle rate, assuming their vehicle was still charged according to their parameters. The inflexibility and lack of customer agency in the managed charging throttling program makes it a suboptimal method for reducing demand.

70. Q: How will the Companies determine the optimal throttle level for each customer class?

A: The Companies consider "optimal results in each customer class as the throttle levels that will provide the most participation with the lowest opt outs or overrides."[65] I am concerned that this will result in low throttle levels, reducing the demand reduction of the managed charging programs. It is likely that the least disruptive approach, i.e. the lowest throttle rates, will be selected under this selection criteria.

71. Q: Why did the Companies choose a managed charging throttling program instead of an alternative with curtailing and delaying charging?

A: The Companies' rationale was that throttling "allows for a better customer service experience when the customer who is charging is not fully reduced."[66]

72. Q: Do you agree that throttling offers a better customer experience as opposed to delaying charging?

[65] Response to WRA DR 3-11.
[66] Response to WRA DR 3-12.

A: No. I think the best customer experience depends not on whether charging is throttled or delayed, but rather upon having their vehicle at the needed state of charge at the appropriate time. A customer is unlikely to care whether their charging was temporarily reduced in capacity or delayed, so long as the vehicle is readily charged when they need it. As such, I disagree that the Company cannot fully reduce and delay charging to achieve greater demand reduction.

73. Q: What do you consider the 'hierarchy' of reducing charging demand?

A: I consider the best demand reduction strategy for a certain period to be delaying charging entirely, so that no charging occurs during the given period during which charging is least optimal. If this is not possible, reducing the charging demand by a certain percentage based upon a customer's parameters for when they need their vehicle at a certain charge is appropriate. For example, if demand reduction is desired from 7-9 pm and a vehicle driver needs their vehicle charged to a certain percentage by 11 pm, requiring about an hour of charging, a managed charging program would ideally have the charging occur from 9-10 pm rather than reducing the charging percentage so that the vehicle charged at a lower capacity during the demand reduction period. In well-designed managed charging programs, the needs of the vehicle driver govern the decision-making process for whether it is appropriate to adjust charging time and/or speed.

74. Q: The Company has also proposed the Qualified Income Multifamily Charging Infrastructure Build Program and Workplace Managed Charging Build Program. Are these programs designed to drive demand reduction and create a positive customer experience?

A: No. For the Qualified Income Multifamily Charging Infrastructure Build Program, drivers can override events and receive no incentive not to do so, since the owner of the electric account is the party that receives the bill credits for participation.[67] While this allows for EV driver agency, the program design presents no incentive to participate in managed charging events. On the other end of the spectrum, the Workplace Managed Charging Infrastructure Build Program has no opt out option for managed charging events.[68] This means that hypothetically an EV driver charging at work could not receive the needed state of charge due to a managed charging event. This could result in a poor customer experience in which a customer may not even be aware that an event is occurring since "notification of managed charging events would be the responsibility of the workplace building owner/person."[69] These programs illustrate that the Companies have not considered how managed charging programs will interface with the customers utilizing charging infrastructure.

75. Q: Could the managed charging offerings be improved by ensuring that price signals are passed through to customers and that customers have agency in determining when to opt out for managed charging events?

A: Yes. This would greatly improve the customer experience, which is important due to the Companies' survey results indicating that current EV drivers have concerns about losing control over their charging with managed charging programs.

76. Q: What do you recommend regarding how the Companies should change the managed charging programs?

[67] Response to WRA DR 3-18.
[68] Volume 20, page 285.
[69] Response to Staff DR-46.

A: I recommend changing the managed charging programs so that notifications of events are delivered to any driver who is plugged in and by allowing drivers participating in all programs to override events. This will create a more favorable customer experience.

77. Q: Do you think the minimum 36-month participation period for managed charging programs is reasonable?

A: No. A minimum participation period of 36 months is required for the Residential Managed Charging Build Program, Qualified Income Multifamily Charging Infrastructure Build Program, Fleet Managed Charging Build Program, and Workplace Managed Charging Build Program. The 3-year minimum participation period may be off-putting to customers who have never participated in a managed charging program previously. Furthermore, the Companies' program design that requires a customer to "return the full enrollment incentive back to NV Energy" if they do not participate in any managed charging events.[70] I am concerned that the possibility of being required to return their enrollment incentives, especially for low-income customers, will be a deterrent to signing up for the program in the first place.

78. Q: How do you recommend modifying the managed charging minimum participation period?

A: I recommend changing the minimum participation period to 12 months. Customers would enroll for the 36-month period but could opt out without a penalty after 12 months . This also aligns with the other enrollment commitments that the company requires for various rate schedules and extant programs that the Companies offer.

[70] Volume 20, page 277.

79. Q: Please describe the Qualified Income Multifamily Charging Infrastructure Build Program.

A: The Qualified Income Multifamily Charging Infrastructure Build Program provides incentives for the installation of chargers at income qualified multifamily residences, covering "all infrastructure costs, including cost of the charging equipment that are not part of the Rule 9 process."[71] The program provides an incentive of up to $30,000 for small multifamily residences and up to $65,000 for large multifamily residences and is able to support up to a total of 742 ports.[72]

80. Q: Is it especially important for the Companies to support charging deployment at multifamily residences?

A: Yes. Multifamily residents are largely unable to install charging infrastructure on their own, and multifamily building owners generally are not incentivized to do so. Even though approximately 31% of residences in the U.S. are multi-unit dwellings, less than 5% of home charging takes place at multi-unit dwellings.[73]

81. Q: How did the Companies develop minimum charger requirements for the Qualified Income Multifamily Charging Infrastructure Build Program?

A: The minimum of six chargers was established seemingly arbitrarily, "to set a minimum threshold."[74] The Companies acknowledged that this approach did not make sense in certain cases, stating, for instance, "a multifamily unit with only five units would be exempt from the six-charger requirements" and that the Companies would "finalize the

[71] Response to WRA DR 3-20.
[72] Volume 20, page 279.
[73] Jamieson, Gibson, Wood, and Owens, Forth, "Technological Barriers to Electric Vehicle Charging at Multi-Unit Dwellings in the U.S" (June 2022), *found at:* https://forthmobility.org/storage/app/media/Reports/MUD%20EVS%20Paper.pdf.
[74] Response to WRA DR 3-14.

number of chargers available to the property based on the property size within budget and may adjust based on each customer request."[75]

82. Q: Are you concerned by this approach?

A: Yes. I am concerned that having program guidelines with a minimum of six Level 2 chargers may discourage multifamily residences from applying to the Qualified Income Multifamily Charging Infrastructure Build Program. The six port minimum will likely be too high for multifamily residences who have yet to install a single EV charger. Especially given that many income qualified multifamily residences may have few, if any, current EV drivers, the minimum port requirement is inappropriate for this program. I recommend that the Companies offer a per-port incentive instead, allowing multifamily residences to select an appropriate number of ports for their buildings.

83. Q: Please describe how the Qualified Income Multifamily Charging Infrastructure Build Programs offers disparate incentive levels for small and large multifamily residences for the same number of chargers.

A: Small multifamily residences (those with 5-30 units) and large multifamily residences (those with have 31 units or more) receive different levels of support.76 The Qualified Income Multifamily Charging Infrastructure Build program is structured so that a 30-unit building installing 6 chargers would receive up to $30,000, while a 31-unit building also installing 6 chargers would receive up to $65,000. This amounts to a small multifamily residence receiving up to $5,000 per charger, while a large multifamily residence would

[75] Response to WRA DR 3-15.
[76] Volume 20, page 279.

receive up to $10,833 per charger. This disparate level of incentives based on the number of units in a multifamily residence is not justified and does not make sense.

84. Q: Should the Commission approve the incentives in the Qualified Income Multifamily Charging Build Program?

A: No. The Commission should approve per-port incentives that do not vary based on the number of units in a multifamily residence. Plan B presents a detailed approach for doing so.

85. Q: Please describe the Fleet Managed Charging Build Program's requirements.

A: The Fleet Managed Charging Build Program requires fleets to install 8-36 Level 2 ports and/or 2-4 DCFC ports. The "minimum number was set to have a minimum threshold."[77]

86. Q: Do you think the Fleet Managed Charging Build Program's port requirements are reasonable?

A: No. I think the minimum port requirement will be a deterrent to applicants. Standardized port requirements for different segments were identified in previous programs as a barrier to participation. The requirements, especially for Level 2 ports, will exclude small fleets who have few vehicles and cannot meet the port minimums.

87. Q: Please describe the Workplace Managed Charging Build Program's requirements.

A: The Workplace Managed Charging Build Program requires workplaces to install 10-20 Level 2 ports. The "minimum number was set to have a minimum threshold."[78]

88. Q: Do you think the Workplace Managed Charging Build Program's port requirements are reasonable?

[77] Response to WRA DR 3-23.
[78] Response to WRA DR 3-25.

A: No. I think the minimum port requirement will again be a deterrent to applicants, who may be installing fewer than the minimum number of ports. Furthermore, these requirements categorically exclude small workplaces with few parking spaces. Once again, the Companies have not considered the prior feedback they received that stringent port minimums constrain program participation.

SECTION 5

Procedural Recommendations

89. Q: How do you recommend the Commission proceed in its consideration of the Companies' Plan?

A: I recommend that the Commission deem the Plan inadequate because the Companies' Plan does not meet the statutory objective of SB 448 to accelerate transportation electrification. I further recommend that the Commission direct the Companies to refile a Plan that meets the statutory criteria. This scenario is referred to hereafter as Plan A.

90. Q: Do you have further recommendations for what should be included in the refiled Plan?

A: Yes. I recommend that the Commission direct the Companies' refiled Plan to include, at minimum, the following elements:

- Residential Level 2 charger installation incentives for standard and low-income customers
- EV purchase and lease rebates for low-income customers
- Level 2 charger installation incentives for standard and income-qualified multifamily residences
- Level 2 charger installation incentives for workplaces

- Level 2 and DCFC charger installation incentives for fleets
- Level 2 and DCFC charger installation incentives for public use

91. Q: Why do you focus on these elements?

A: The infrastructure programs ensure customers have access to charging, increasing private investment and customer choice. Additionally, the purchase and lease rebates for low-income customers and the charger incentives for standard and income-qualified multi-family residents ensure that all customers have access to electric vehicles and charging infrastructure. These elements are consistent with the statutory direction established in SB 448.

92. Q: If the Commission does not adopt your Plan A recommendation, should the Commission require the Companies to add programs to the proposed Plan?

A: Yes. If the Commission does not direct the Companies to refile, the Commission should modify this Plan to include additional programs and allocate funding to those programs. This scenario is referred to hereafter as Plan B.

93. Q: Is it especially important that this Plan offers programs targeting charging deployment for market segments that are not served through ERTEP and the 2022-2024 TEP?

A: Yes. ERTEP's scope specifically targeted urban public charging, transit and school bus charging, interstate charging, public agency charging and outdoor recreation/tourism charging. The 2022-2024 TEP proposed programs spanning various market segments, but only programs for interstate corridors and electric school buses were approved. Programs for low-income EV rebates, residential charging, multifamily charging, workplace charging, urban public charging, and fleet charging were rejected. As such, the above

segments have not had targeted utility programs since mid-2023, when EVID concluded. If no programs for the mentioned market segments are approved in the 2025-2027 TEP, these critical segments will have been unsupported by the utility from 2023 until at least 2027, when a new plan will be proposed. Four years without utility support for these critical charging segments would be a significant loss for the Companies' customers, and is inconsistent with the legislative intent of SB448.

94. Q: Do you have detailed recommendations for the programs you suggest adding to the Plan in the Plan B scenario?

A: Yes. I recommend adopting the incentive levels for market segments based on the incentive levels approved in EVID:

- Provide an incentive that is the lesser amount of $3,000 or 75% of total costs per port for workplace Level 2 chargers.
- Provide an incentive of $5,000 per port for Level 2 chargers in standard multifamily residences and $10,000 per port for qualified income multifamily residences.
- Provide an incentive of $500 to residential customers installing a Level 2 home charger.
- Provide an incentive of $2,500 to lower-income customers for the purchase or lease of an electric vehicle.
- Provide an incentive that is the lesser amount of $3,000 or 75% of total costs per port for public Level 2 chargers.
- Provide an incentive that is the lesser amount of $5,000 or 75% of total costs per port for fleet Level 2 chargers.

- Provide an incentive that is the lesser amount of $500 per kilowatt, up to $40,000 per charging station, or 50% of project costs for commercial customers installing direct current fast chargers.

95. Q: Please elaborate on the incentive levels you proposed for Plan B.

A: The incentive levels I proposed above are the incentive levels that the Commission approved for analogous programs in EVID for program year 2022-2023.[79] These incentive levels resulted in uptake among the Companies' customers, with all EVID funds being fully reserved.

96. Q: Are there any modifications you propose in Plan B from the EVID incentive levels that were approved?

A: Yes. For the multifamily incentives, I did not include the 75% total project cost percentage provision given the challenges of installing charging at multifamily residences. Furthermore, I do not recommend including port minimums for any of the programs. Instead, the programs should offer incentives on a per-port basis. This approach ensures that customers seeking to install a small number of EV chargers are not unnecessarily barred from program participation. This approach would also address the issues the Companies have experienced in implementing programs where the amount of charging sites is predetermined and there is not adequate flexibility to accommodate site host needs.

97. Q: Please provide the number of incentives you propose for each of the programs in Plan B.

[79] *See* Attachments DK-17, 18, and 19.

A: I propose that the Companies offer the following number of incentives: 4,250 residential incentives, 400 workplace incentives, 400 fleet incentives, 400 qualified income multifamily incentives, 400 multifamily incentives, 2,000 low income EV rebates, 400 public incentives, and 220 DCFC incentives.

98. Q: Please provide the approximate budget for the programs you suggest adding in Plan B.

A: I suggest that the 2025-2027 budget be proportional to the budget for EVID, which had $15 million for 2019 through mid-2023. In 2019, the state of Nevada had 7,900 registered EVs and in mid-2023, it had approximately 40,130 registered EVs.[80] If we conservatively assume that approximately 80% of EVs were in the Companies' service territories[81] and the EV growth rate from 2022 to 2023 of 30.5% annually continues, Nevada will have 61,857 registered EVs in 2024, 80,723 in 2025, 105,344 in 2026, and 137,473 in 2027. Keeping with the assumption of 80% of EVs being in the Companies' service territories, this amounts to 64,578 EVs in 2025, 84,275 EVs in 2026, and 109,979 EVs in 2027 in the Companies' service territories. To ensure that each new EV registered in the Companies' service territories from 2025-2027 has access to at least the same amount of utility support as in the EVID period, the Companies' TEP budget should include approximately $26,377,659 of funding for infrastructure and EV purchase incentives.

99. Q: Please provide a table with budgets on a program-by-program basis for Plan B.

A: Please see Table 1 below.

[80] Alternative Fuels Data Center: TransAtlas, *found at*: https://afdc.energy.gov/transatlas#/?state=NV&view=vehicle_count.
[81] Map of NV Energy Gas and Electric Service Areas, *found at:* https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/our-company/territory/NVEnergy_Service_area_map.pdf.

Table 1: Proposed TEP Program Budgets for Plan B

Program	Incentive per port	Number of Ports/Number of Incentives Available	Program Budget
Residential	**$500**	**4,250**	**$2,125,000**
Workplace	**$3,000**	**400**	**$1,200,000**
Fleet	**$5,000**	**400**	**$2,000,000**
Qualified Income Multifamily	**$10,000**	**400**	**$4,000,000**
Multifamily	**$5,000**	**400**	**$2,000,000**
Lower Income EV Rebate	**$2,500**	**2,000**	**$5,000,000**
Public	**$3,000**	**400**	**$1,200,000**
DCFC	**$40,000**	**220**	**$8,800,000**

100. Q: How would your Plan B proposal interact with the Company's proposed Plan?

A: My Plan B recommends that the Commission require the Companies to include my proposed programs in addition to their proposed Plan, except as noted. My Qualified Income Multifamily proposal would be in lieu of their Qualified Income Multifamily Build Program. For the Residential, Workplace, Fleet, and Multifamily programs that I propose, I recommend that customers participating in those programs have the option to enroll in the relevant managed charging programs per the Companies' Plan.

101. Q: What would the total 2025-2027 Plan budget be, combining your proposals and the Companies' Plan, in Plan B?

A: The total budget would be approximately $38.6 million for the 2025-2027 Plan.

102. Q: Is your proposed total Plan budget for Plan B lower than the 2022-2024 budget?

A: Yes. My proposed total Plan budget for Plan B is lower than the $56 million approved in the 2022-2024 TEP. Additionally, the ERTEP program funds will not be available during the Plan period.

103. Q: Is approval of a 2025-2027 Plan with the above programs crucial for ensuring an equitable transition to electrified transportation in the Companies' service territory?

A: Yes. As stated above, customers will no longer have access to the ERTEP program during the Plan period; the 2025-2027 TEP is the 'whole enchilada' of utility offerings for the period. This time frame represents a crucial period, as the Companies' 2022 customer survey found that household income was no longer a statistically significant predictor of EV adoption likelihood; customers of all household income levels are becoming EV drivers. As EV adoption continues to grow, the Companies' transportation electrification plans will be a determining factor in how Nevadans access EV charging. As such, I urge the Commission to ensure that the 2025-2027 Plan accelerates transportation electrification in a way that benefits a broad swath of the Companies' customers.

104. Q. Are there other reasons you recommend the Commission direct the Company to develop and implement these programs now?

A: Yes. As I described earlier in my testimony, electrifying transportation is an essential component of meeting Nevada's statutory climate goals. As electric vehicle adoption

increases, Nevada will need an increasing number of charging ports, along with programs to manage that charging and programs to ensure equitable access to electric vehicles. It is critical for the Companies to develop experience with implementing these programs today, so that they are prepared to implement them on a broader scale in the future.

SECTION 6

Conclusion

105. Q: Does this conclude your testimony?

A: Yes, this concludes my testimony.

Attachment DK-1

QUALIFICATIONS

DEBORAH KAPILOFF

Experience: Western Resource Advocates, Clean Energy Program

Transportation Electrification Policy Analyst, June 2021 – present
My role is to research, develop and advocate for policies and mechanisms to promote transportation electrification and greenhouse gas emission reductions from the transportation sector in the Interior West. This involves representing WRA in regulatory, legislative, and other policy forums and analyzing transportation electrification policies in order to understand their overall feasibility, emission reduction potential, and impact on the electricity grid.

Regional Markets Intern, Western Resource Advocates, Salt Lake City, UT
November 2020 – June 2021
As a Regional Markets intern, I wrote a policy paper detailing best practices and considerations for greenhouse accounting in the West. My paper was based on my research into how state climate goals and emissions reductions commitments can be accommodated in regional wholesale electricity markets through robust greenhouse gas accounting.

Research Intern, Zero Emission Resource Organization, Oslo, Norway
January – February 2020
In this role I researched European Union carbon markets' effects intersections with country and sector-specific emissions reductions goals, as well as assisted staff with research on various topics, including public transit electrification. Specifically, I worked with the city of Oslo on developing recommendations for the electrification of its ferry fleet.

Waste to Wealth Intern, Institute for Local Self-Reliance, Washington, D.C.
June 2019 – August 2019
My position with the Institute for Local Self-Reliance involved performing community outreach and working with municipalities to develop waste reduction strategies. Additionally, I worked with environmental justice groups to create a mapping tool illustrating the effects of waste policy on low-income communities and communities of color.

Svoboda Legal Scholar, Mitchell Hamline School of Law, Saint Paul, MN
June 2018 – August 2018
As a Svoboda Legal Scholar, I assisted attorneys with clients seeking legal aid for a variety of issues, including notices of utility disconnection, eviction, and other problems facing low income individuals. Additionally, I aided in creating know-your-rights educational materials about these topics.

Education: Bachelor of Arts, Political Science and Environmental Studies, Concentration in Social Science, St. Olaf College, Northfield, MN, May 2020

Attachment DK-2

bidgely

NVE | EV Analysis Report

August, 2023

Bidgely Confidential

Introduction

- This report presents results from analysis of Electric Vehicles charging behavior for NVE customers in Nevada. We aim to present how Bidgely's itemization and time of use(ToU) capabilities can help build various **EV centric customer-targeting strategies**
- **114,194 users** were selected spread across the **11 zip codes**

The expected outcomes:

1. A list of all L2 EV owners or NVE including an indication of how many hours are charged on peak

2. A determination of the best candidates to target for managed charging - essentially those customers that charge more than 70 hours on peak or more than 25% of their kWh on peak.

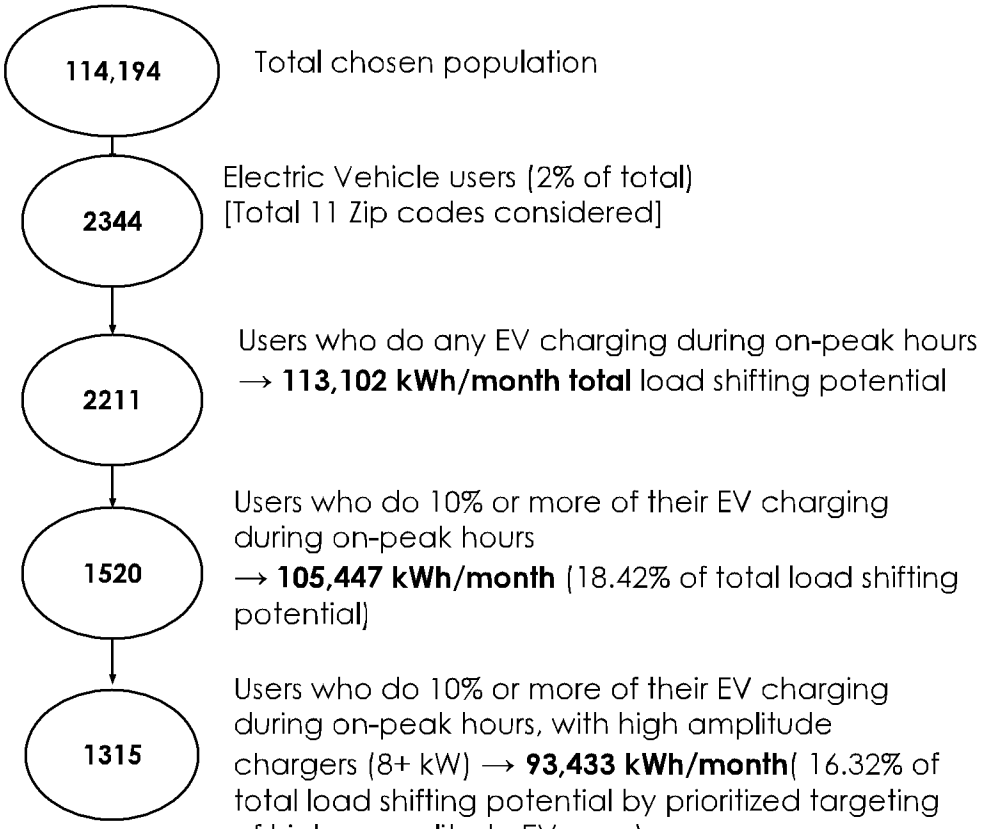
3. List of all detected customers with confidence over .5 and their total hours of consumption

4. Total consumed during 3-9pm pst , Total consumed during 10pm-8am pst

bidgely

Aggregate Level Insights

Identified Potential Target EV Users for Load Shifting Opportunities



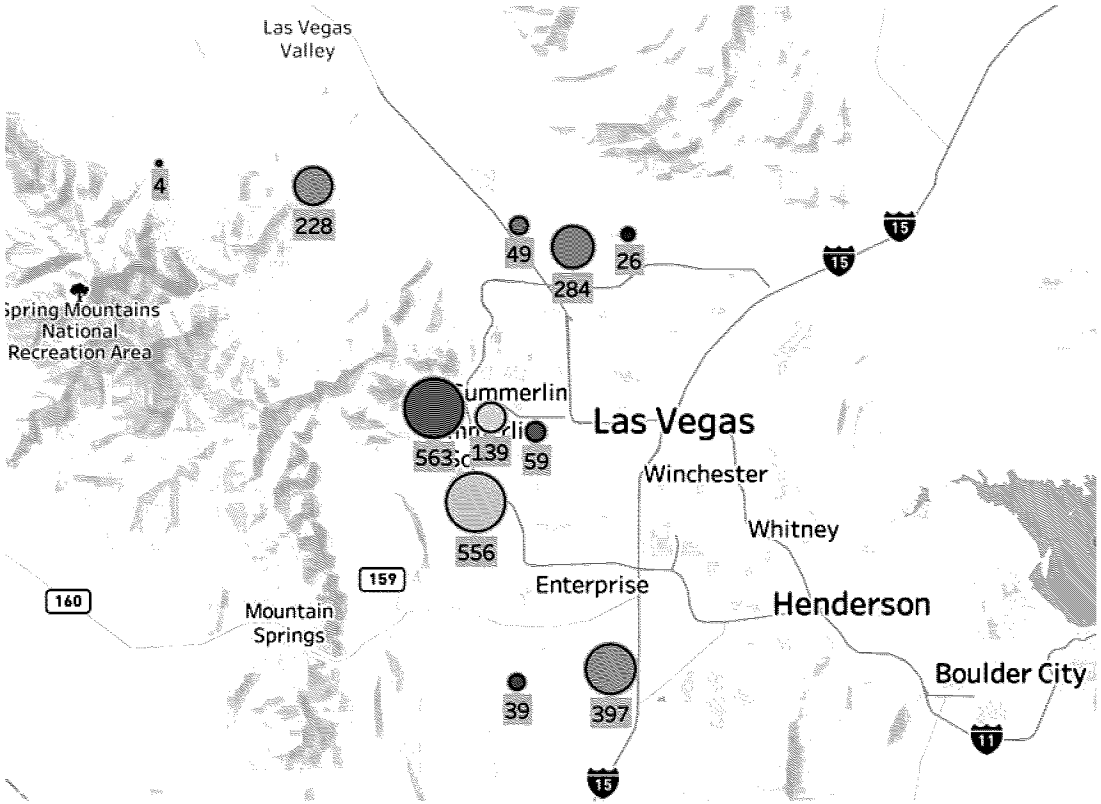
Avg. charging duration	~3.1 Hours
Avg. charging amplitude	~9.9 kW
Avg. monthly EV charging consumption	~244 kWh/user
Avg. monthly EV charging during On-peak hours	~51(~21%) kWh/user

Bidgely Confidential

EV Distribution across Zip codes

Zip Code	EV count	Total Users	EV %
89085	26	1403	1.85%
89124	4	754	0.53%
89131	284	18442	1.54%
89135	556	17265	3.22%
89138	563	12216	4.61%
89141	397	18964	2.09%
89143	49	5228	0.94%
89144	139	9273	1.50%
89145	59	13433	0.44%
89166	228	13007	1.75%
89179	39	4209	0.93%

EV Distribution Map



Bidgely Confidential

bidgely
Thank You
Bidgely Confidential

Attachment DK-3

The expected outcomes:

1. A list of all EV owners with L2 chargers for NVE including an indication of how many hours of charging on peak
2. A determination of the best candidates to target for managed charging - essentially those customers falling in the top 2 quartiles of peak charging.
3. Get the list of all detected customers with confidence over .5 and provide for each of those customers the hours total consumed
4. Total consumed during 3-9pm pst considered for on-peak
5. Total consumed during 10pm-8am pst considered for off-peak

Analysis is based on NVE EV disagg data from 1st July 2022 - 1st July 2023 and peak time considered as 3-9pm

Total Chosen Population	**114,194**	
Total Zip codes considered	**11**	
Total UUIDs with EV detection confidence >50%	**2,344**	
Electric Vehicle users penetration	**2.05%**	
Users who do any EV charging during on-peak hours (3pm-9pm)	**2,211**	**94%**
Users who do any EV charging in 10pm-8am	**2,341**	**100%**
Top 2 Quartile high consumption TOU Users	**1,106**	**47%**
Users who had 10% or more of their EV charging during on-peak hours	**1,520**	**65%**
Users who had 10% or more of their EV charging during on-peak hours and amplitude >8kWh	**1,315**	**56%**

	Per year (kWh	Per Month (kWh	Per User per Month (kWh)	
Total consumption	7,103,300	591,942	253	
Peak time consumption (3pm-9pm)	1,396,805	116,400	50	
Total EV consumption during 10pm-8am	2,886,025	240,502	103	
Peak time consumption contributed by Top 2 Quartile TOU users	1,210,202	100,850	43	
Total Consumption of Users who had 10% or more of their EV charging during on-peak hours	1,301,042	108,420	46	**18.32%**
Total Consumption of Users who had 10% or more of their EV charging during on-peak hours and amplitude	1,152,519	96,043	41	**16.23%**
Annual consumption % of peak time charging	20%			
Annual consumption % of 10pm-8am charging	41%			
Annual consumption % of peak time consumption contributed by Top 2 Quartile users	17%			
Annual consumption % of Users who had 10% or more of their EV charging during on-peak hours	18%			
Annual consumption % of Users who had 10% or more of their EV charging during on-peak hours and ampli	16%			
Average Charging Duartion	**3.1 Hrs**			
Average Detection Confidence	**81%**			
Average Charging Amplitiude	**9.9 kWh**			

	Per year (Hrs)	Per Month (Hrs	Per User per Month (Hrs)
Total charging in hours	807,796	67,316	29
Peak time charging in hours	156,233	13,019	6
Charging during 10pm-8am	331,123	27,594	12
Peak time consumption contributed by Top 2 Quartile TOU users	133,787	11,149	10
Total charging time of Users who had 10% or more of their EV charging during on-peak hours	144,407	12,034	8
Total charging time of Users who had 10% or more of their EV charging during on-peak hours and amplitude	122,111	10,176	8

Attachment DK-4

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-05	**KEYWORD:**	narrative vol 20 p260; calculate customers bill reduction TOU rate
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 260 of 304

Question: a) The Companies state that "EV owners who would likely get a bill reduction by switching to a TOU rate will receive a proactive notification to encourage a switch to a TOU Rate." Please describe how the Companies will calculate which customers would likely get a bill reduction on a TOU rate.

b) The Companies state that "EV owners on the TOU rates will receive regular (monthly and ad-hoc) notifications about how to optimize their charging behavior to save the most with their TOU rate." Please describe the format of these notifications.

c) Please describe how the Companies will share the data collected on EV customer engagement, effectiveness of TOU rates at shifting EV loads, and effectiveness of coaching on changing customer charging habits.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

a) Please see Staff DR 32 and Staff DR 33 which describes how the Companies will calculate which customers would likely get a bill reduction on a TOU rate.

b) Please see Staff DR 32 and 33 that describes these notifications.

c) The Companies' vendor offers out-of-the-box reporting dashboards that are updated daily and allow the tracking of customer engagement metrics, and the amount of load shift achieved through the transition to the TOU rate and coaching. All metrics can be downloaded from the dashboard in CSV and PDF format. This allows the Companies to share this data with the Commission if needed.

Attachment DK-5

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-10	**KEYWORD:**	narrative vol 20 p270; Rule 9 EV Adder Allowances customers
REQUESTER:	Holman	**RESPONDER:**	Pascal, Misha (NV Energy)

REQUEST:

Reference: Narrative Volume 20, page 270 of 304

Question: Please provide the number of customers who received the following Rule 9 EV Adder Allowances on an annual basis from 2022 to 2024:

a) Single-family residential

b) Multifamily residential

c) Commercial

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

These are all the recipients from 2022 to date.

SPPC:
a)115
b)0
c)Does not exist

Nevada Power:
a) 160
b) 2
c) Does not exist

Attachment DK-6

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-11	**KEYWORD:**	narrative vol 20 p273; determine optimal results each customer class throttle le
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 273 of 304

Question: Please describe how the Companies will determine what constitutes "optimal results in each customer class" for the throttle level of managed charging.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The Companies constitute "optimal results in each customer class" as the throttle levels that will provide the most participation with the lowest opt outs or overrides.

Attachment DK-7

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-12	**KEYWORD:**	narrative vol 20 p273; throttled managed charging approach
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 273 of 304

Question: Please explain why the Companies chose to use a throttled managed charging approach, rather than curtailing and delaying charging (ceasing charging during an event and resuming charging at full capacity after the event).

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The Companies chose throttling over curtailing and delaying because it allows for a better customer service experience when the customer who is charging is not fully reduced. It also allows for the customer and the utility to have flexibility during the events.

It also does not eliminate the option to utilize full curtailment, since a level of throttle can be to 0 percent in case of extreme need or emergency.

Attachment DK-8

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-13	**KEYWORD:**	narrative vol 20 p273; 36-month minimum participation period managed charging pr
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 273 of 304 (correct page number 274 of 304)

Question: Please provide the rationale for requiring a 36-month minimum participation period for the managed charging programs.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The 36-month period was used as the basis for this requirement to coincide with the length of this action plan period.

Attachment DK-9

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-14	**KEYWORD:**	narrative vol 20 p279; requirement determination Qualified Income Multifamily Ch
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 279 of 304

Question: Please describe how the Companies determined the requirement for multifamily residences to install a minimum of six and maximum of 20 L2 chargers for the Qualified Income Multifamily Charging Infrastructure Build Program.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The maximum number of 20 chargers was established based on the budgets proposed for the program while the minimum number of six was set to have a minimum threshold.

The Company plans to work with each participant to finalize the number of chargers available to the property based on the property size within budget and may adjust based on each customer request.

Attachment DK-10

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-15	**KEYWORD:**	narrative vol 20 p279; program minimum requirement Qualified Income Multifamily
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 279 of 304

Question: Please explain how a multifamily residence with five units could meet the program minimum requirement of installing six L2 chargers for the Qualified Income Multifamily Charging Infrastructure Build Program.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

A multifamily unit with only five units would be exempt from the six-charger requirements. The Companies plan to work with each participant to finalize the number of chargers available to the property based on the property size within budget and may adjust based on each customer request.

Attachment DK-11

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-18	**KEYWORD:**	narrative vol 20 p279; individual multifamily residents Qualified Income Multifa
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 279 of 304

Question: Please clarify if for the Qualified Income Multifamily Charging Infrastructure Build Program, individual multifamily residents will be the parties able to override managed charging events and receive bill credits.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The driver of the electric vehicle charger can override the event. The owner of the electric account participating in the managed charging program, will receive the bill credits because they are responsible for the bill, but can pass on the savings to others if they choose.

Attachment DK-12

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-20	**KEYWORD:**	narrative vol 20 p280; eligible activities expenses, costs associated building i
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 280 of 304

Question: Please define eligible activities and expenses covered under the "costs associated with building the infrastructure for charging stations" for the Qualified Income Multifamily Charging Infrastructure Build Program.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

All infrastructure costs, including cost of the charging equipment that are not part of the Rule 9 process, would be considered "costs associated with building the infrastructure for charging stations."

Attachment DK-13

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-23	**KEYWORD:**	narrative vol 20 p283; participation Fleet Managed Charging Build Program
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 283 of 304

Question: Please explain how the Companies developed the requirement that fleets must install 8-36 L2 ports and/or 204 DCFC ports for participation in the Fleet Managed Charging Build Program.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The maximum number of chargers was established based on the budgets proposed for the program while the minimum number was set to have a minimum threshold. The Company plans to work with each participant to finalize the number of chargers available to the property within budget and may adjust based on each customer request.

Attachment DK-14

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-25	**KEYWORD:**	narrative vol 20 p286; participation Workplace Managed Charging Build Program
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 286 of 304

Question: Please explain how the Companies developed the requirement that workplaces must install a minimum of 10 and maximum of 20 L2 charging ports for participation in the Workplace Managed Charging Build Program.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The maximum number of chargers was established based on the budgets proposed for the program while the minimum number was set to have a minimum threshold.

The Company plans to work with each participant to finalize the number of chargers available to the property within budget and may adjust based on each customer request.

Attachment DK-15

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-22-2024
REQUEST NO:	WRA 3-28	**KEYWORD:**	narrative vol 20 p294; updated spend $15 million infrastructure TEP
REQUESTER:	Holman	**RESPONDER:**	Grant, Adam

REQUEST:

Reference: Narrative Volume 20, page 294 of 304

Question: Please provide an update on how much of the "more than $15 million in funds reserved for infrastructure" in the TEP has been expended to date.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

To date, of the "more than $15 million in funds reserved for infrastructure," $0 has been expended.

Attachment DK-16

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-05041	**REQUEST DATE:**	07-31-2024
REQUEST NO:	WRA 4-03	**KEYWORD:**	pascal testimony vol 3 p179; public Level 2 DCFC chargers, commercial Rule 9 EV
REQUESTER:	Holman	**RESPONDER:**	Pascal, Misha (NV Energy)

REQUEST:

Reference: Volume 3 of 29, page 179 of 285, page 6 of Pascal direct testimony

Question: a. Please confirm that public Level 2 and DCFC chargers which charge drivers for charging are ineligible to receive 100% of the Estimated Demand Based Allowance upfront through the commercial Rule 9 EV Allowance.

b. Please describe why the Companies developed each of the requirements for customers to receive the Rule 9 EV Allowance upfront.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

a) Correct, as designed and proposed, public Level 2 and DCFC chargers which charge drivers for charging are ineligible to receive 100 percent of the Estimated Demand Based Allowance upfront through the commercial Rule 9 EV Allowances.

b) The Companies have proposed requirements to support the installation of commercial electric vehicle infrastructure by participation in programs and tariffs designed to create a flexible transportation electrification load, which may benefit all customers. Additionally, the proposal includes pricing requirements that support all electric vehicle drivers.

Attachment DK-17

Commercial Electric Vehicle Charging Station Incentives

Program Handbook

July 1, 2022 – June 30, 2023

Funding for the Electric Vehicle Infrastructure Demonstration (EVID) program has been fully reserved. Applications that have not already received a reservation notice will instead receive a conditional reservation notice upon application approval. Projects may begin construction upon receiving a conditional reservation notice, but funds are not guaranteed until a reservation notice has been issued.

Please ensure you are reading the most recent version of this handbook by visiting the NV Energy website: Electric Vehicles.

CONTENTS

Version No.	Date	Description
1	07/01/2020	New program year updates
2	08/12/2020	Revised contractor licensing requirement to include accepting C2A licenses.
3	8/31/2020	Added table showing number of proprietary chargers allowed
4	7/1/2021	Added Residential Single Family EV Charging program.
	11/9/2021	Removed Residential Program information
5	06/27/2022	PY Date '22 & Logo Updates

1. DEFINITIONS

This section includes a list of terms that defined for common use within this program handbook.

Applicant: The party responsible for preparing the application and grant claim package in the online application portal.

Communal parking spaces for EV Charging: EV Charging stations installed in communal areas where they can be accessed by all residents.

Completed: The Electric Vehicle Charging Station is considered Completed when it is completely installed, the building permit is satisfied, and the system is capable of being used in the manner for which it was designed. If selected for Program Inspection, the system is considered Completed only once the inspection is Completed and passed.

Connector: The physical plug inserted into the vehicle receptacle.

Dedicated parking spaces for EV Charging: EV Charging stations installed in an assigned individual parking space.

Designated Applicant: An individual or entity designated by the NV Energy Host Customer to apply on their behalf.

Direct Current ("DC") Fast Charger: A charging station utilizing 480 volt, three-phase power. May also be referred to as a level 3 charger. The minimum output for eligible chargers shall be 50kW to participate in NV Energy incentive programs.

Electric Vehicle ("EV"): Any vehicle that uses electric motors for propulsion.

EV Charging Station or Charging Station: The equipment that is used to charge at least one EV. A Charging Station may have more than one Connector and is sometimes also called a charging point.

EV Charging Station Incentives: NV Energy incentive program supporting the installation of Level 2 and/or DC fast charging stations that serves multifamily, workplace, public convenience, lower-income multifamily, governmental, fleet, and residential applicants.

Electric Vehicle Supply Equipment ("EVSE"): Electric Vehicle Supply Equipment used for charging EVs including (i) the charging station, conductors, including the ungrounded, grounded, and equipment grounding conductors, the electric vehicle connectors, attachment plugs, and all other fittings, devices, power outlets, or apparatuses installed specifically for the purpose of delivering energy from the premises wiring to the electric vehicle, and (ii) software and firmware installed on any such devices and communications devices (internal or external) necessary to network enable the EVSE and provide for remote monitoring and management of the devices through the EVSE Management Service.

EVSE Management Service: A cloud-based service to operate, maintain, monitor, and manage the EVSE, including EVSE management activities, such as day-to-day customer service, providing driver support, and monitoring station uptime.

Eligible Project Costs: Tangible materials and labor for the installed system, including fees for local building authority permitting. Costs may also include other required equipment, project design and engineering costs and costs associated with making the site ready for installation (make-ready costs).

Host Customer: The NV Energy customer with the NV Energy utility account (listed on the utility bill) that is associated with the installation address. The Host Customer name must exactly match the name on the NV Energy bill. The Host Customer is responsible for making any changes to their NV Energy bill prior to application. Persons listed as co-applicants on the NV Energy bill may apply as the Host Customer.

Incentive Cap: For all incentive categories the incentive cap will be defined per premise (lease see the definition for "premise" below).

Installation Location: The installation address is the actual address where the EVSE is being installed. The Host Customer should be the owner of the utility account in service for this installation address.

Installer or Installation Contractor: The Nevada licensed electrical contractor (C-2 or C-2A) who performs the installation of the EVSE.

Integration Communications: Describes the open communication protocols that are support for integration with the utility. Some examples are Open Automated Demand Response ("OpenADR") or Open ChargePoint Protocol ("OCPP"), and transport layer protocols of Wi-Fi and cellular.

Level 1 Charging Station: Level 1 charging station (120 volts), without network capability.

Level 2 Charging Station: A Charging Station utilizing 240 volt, single phase power or 208 volt, three phase power.

Networked Charging Station: A Charging Station that has the capability to connect to a system network via an internet connection and offers smart management functions. Some functions offered include managed charging capabilities, price setting, scheduling, user management, and data collection and reporting.

Port: A charging connection to the electric vehicle which is capable of independently charging an electric vehicle simultaneously with any other port.

Premise: as defined in NV Energy Rule No. 1 as defined here:
Southern Nevada: Rule 1 South

Northern Nevada: Rule 1 North

Project: A Project is an installation(s) for one Host Customer on an NV Energy service location(s). A project shall be designated to a specific category and incentive level. A premise can obtain more than one electric vehicle charging station incentive provided that the maximum number of incentivized chargers per premise does not exceed 10 ports.

Proprietary equipment: Electric vehicle charging stations that can only charge one vehicle make. Proprietary equipment are eligible for an incentive for the non-public charging station incentive programs. The non-public programs include the workplace, fleet and multi-family charging incentive programs.
Reservation Notice: Issued after an application has been approved by NV Energy, the Reservation Notice indicates that incentive funds have been reserved for the Project and lists the output power, type of electric vehicle charging system, and the number of proposed charging ports.

Seller: The party that sells or leases the system to the Host Customer.

System Owner: The owner of the installation when the incentive is paid.

2. PROGRAM OVERVIEW

- The goal of the program is to support the installation of electric vehicle charging infrastructure at locations throughout NV Energy's service territories.
- NV Energy offers a number of Electric Vehicle Infrastructure Demonstration ("EVID") programs during the 2022-2023 program year. These programs include Non-residential and Multi-family EV Charging Station Incentives, Residential Single-Family EV Charging Incentives, the Electric School Bus Incentives program and Technical Advisory Services.
- The total of the incentive budget for the EVID program may not exceed $15,000,000 and covers multiple years.
- The program is funded by NV Energy customers and is administered by NV Energy.
- Installations must be permitted through the local building authority and installations must be performed by a Nevada licensed C-2 or C2A electrical contractor.
- Charging stations that are installed before the issuance of the Reservation Notice are not eligible for incentive.
- NV Energy pays incentives as available per NRS 701B.
- NV Energy is not responsible for operation or maintenance costs of Electric Vehicle Charging Stations installed through this program.
- NV Energy is not responsible for consumption changes or billing changes due to the customer's decision to install an Electric Vehicle Charging Station(s).

3. ELIGIBILITY

3.1. Customer Eligibility

The host customer may be required to refund some or all of the incentives they receive if the measures do not remain installed for a period of five (5) years or the expected life of the measure, whichever is greater, or the facility where the measures are installed ceases to be a bundled, full requirement's customer of NV Energy during the said time period.

Commercial NV Energy customers are eligible to apply in one of the following categories:

1. **Multi-Family Charging:** Installations located at multi-family dwellings with two or more units and intended for use by the residents. EV Charging equipment may be installed at Communal or Dedicated parking spaces.

   An applicant for Multi-family charging stations for use in Dedicated parking spaces must have an existing unassigned charging station for the same complex in Communal parking spaces or must install one concurrent with charging stations in assigned parking spaces.

   An applicant for multi-family charging stations must consent to NV Energy accessing charger data from the Host Customer site or the customer must enroll in an NV Energy program that allows data collection on charger usage for all EV chargers on the premises.

   An applicant for Multi-family charging stations for use in assigned parking spaces must include in the application the current number of EV s registered to residents as best known. NV Energy will follow-up with the applicant annually to obtain the current number of residents' EVs.

2. **Fleet Charging:** Installations located at a commercial location operated by a business that intends to use the charging stations for its company vehicles.

3. **Workplace Charging:** Installations located at commercial workplace locations and intended for use by the employees at that location.

4. **Public Convenience Charging:** Installations located at businesses, non-profits, schools, and public enterprises that install on-site charging stations available to the public.

5. **Lower-Income Multi-family Housing Charging:** Offers incentive funding to multi-family properties that can qualify as a low-income housing provider, both State and Federally. The site must be a multi-family property and must be low-income housing that qualifies for the Federal Low-Income Housing Tax credit. Applicants will be required to provide official documents that demonstrate the housing project qualifies as lower-income housing. Installations for lower income housing properties is funded jointly by NV Energy and the Governor's Office of Energy (GOE). NV Energy provides 75% of the project cost, up to $7,500 per port while the GOE contributes the remaining 25% of the total project cost, up to $2,500 per port.

If the property includes Dedicated parking spaces, they must have an existing unassigned charging station for the same complex in Communal parking spaces or must install one concurrent with charging stations in assigned parking spaces.

An applicant for Lower-Income Multi-family charging stations must consent to NV Energy accessing charger data from the Host Customer site. The charger and customer must enroll in an NV Energy program that allows data collection on charger usage for all EV chargers on the premises.

An applicant for Lower-Income Multi-family charging stations for use in assigned parking spaces must include in the application the current number of EV s registered to residents as best known. NV Energy will follow-up with the applicant annually to obtain the current number of residents' EVs.

6. **Governmental Charging:** Governmental public EV charging incentives are available for cities, counties, state and Federal agencies, military, police departments, national parks, library districts and public-school districts.

Projects must be located on an NV Energy customer premise. NV Energy customers who subscribe to a Distribution Only Service ("DOS") rate are not eligible for incentives.

3.2. Installer Eligibility

Participating Installers must have an active C-2 or C2A Nevada contractor's license. If a contractor's license is suspended, applications associated with the contractor are not eligible to receive a Grant Reservation Notice or a grant payment, unless the system was completed and inspected by the local building authority prior to the suspension date. Customers may select a different Installer if needed. Additional information is provided in the Application Changes section in this handbook.

3.3. Equipment Eligibility

Applicants will indicate the EV charging equipment that is proposed for the Project by selecting from qualified equipment in the online application. Applicants may propose to install charging equipment that is not listed provided that the equipment meets the following specifications:

- UL listed.
- Is a Networked Charging Station.
- Capable of Integration Communications with the utility.
- Capable of providing charging data collection to the utility.
- A minimum output of 50 kW is required for DC Fast Chargers.
- New and never previously installed.
- Proprietary charging equipment is eligible for incentives in the non-public fleet, multifamily, lower-income multifamily, workplace and residential charging station incentive programs.

4. PROJECT SITING

Multi-Family Charging: An applicant for Multi-family charging stations for use in Dedicated parking spaces must have an existing unassigned charging station for the same complex in Communal parking spaces or must install one concurrent with charging stations in Dedicated parking spaces. Restrictions do not apply to installations in Communal parking spaces.

Workplace Charging: Charging Stations must be available for employees and cannot be located in parking areas unavailable to workers.

Public Convenience Charging: Charging Stations must be available to the public in public areas and cannot be located in areas unavailable to the public.

Fleet Charging: Charging stations available for charging the fleet vehicles of a business.

Governmental Charging: Charging stations must be available to the public and installed at a state, federal or government agency.

Lower-income Multi-family Housing Charging: an applicant for Lower-Income Multi-family charging stations for use in Dedicated parking spaces must have an existing unassigned charging station for the same complex in Communal parking spaces or must install one concurrent with charging stations in Dedicated parking spaces. Restrictions do not apply to installations in Communal parking spaces.

5. INCENTIVES

5.1. Non-Residential EV Charging Station Incentives

For commercial customers, incentives are calculated by the type and quantity of charging ports or systems installed.

DC Fast Charging: Workplace, Multi-Family, Fleet, and Public Convenience Non-Proprietary Charging			
Charging System Type	Incentive	Minimum System Size	Maximum Incentivized System Size
DC Fast Charger	$400/kW up to a cap of the lesser of $40,000 per Charging Station or 50% of project costs	1 Charging System	5 Charging Systems

Level 2 Charging Workplace, Multi-Family, Fleet, Public Convenience,					
L2 Charger Incentive	**Lesser of:**	**Lesser of: %**	**Min # of ports**	**Max # of ports**	**Max**
Workplace	$3,000	75%	2	10	$30,000
Multi-Family	$5,000	75%	2	10	$50,000
Fleets	$5,000	75%	2	10	$50,000
Public Convenience	$3,000	75%	2	10	$30,000
Governmental	$10,000	100%	2	4	$40,000
Lower-income Multi-family	$10,000	100%	2	4	$40,000

The maximum eligible incentive is calculated during the initial application process and is reserved as listed on the Reservation Notice.

Example 1: An Applicant proposes a system with five (5) Level 2 charging units with 2 ports each for a total of ten (10) charging ports. The initial calculation (for Workplace and Public Convenience) allows for an incentive of up to $30,000 ($3,000 x 10 ports). However, the proposed total project cost is only $20,000, so the reserved incentive is capped at 75% of the project cost, or $15,000.

Example 2: An Applicant proposes a system with two (2) DC fast charging units of 50kW each, and six (6) Level 2 charging ports. The reserved incentive will have 2 parts, one for the DC fast charger, and one for the Level 2 ports. The total estimated installation cost is $100,000. The estimated installation cost for the Level 2 infrastructure is $12,000.

DC Fast Charger = Lessor of [(50 x $400) x 2 = **$40,000**] OR [(50% of project cost) = $50,000]

Level 2 Ports = Lesser of [(6 x $3,000) = $18,000] OR [(75% x $12,000) = **$9,000**]

In this example the incentive reservation will be issued for $49,000 or ($40,000 + $9,000).

Incentive Cap: For all incentive categories, the incentive cap will be defined per premise as defined in Rule No. 1. A project shall be designated to a specific category and incentive level. A premise can obtain more than one electric vehicle charging station incentive provided that the maximum number of incentivized chargers per premise cannot exceed 10 ports.

Governmental and Lower-Income Multi-Family Charging Incentive breakdown (Non-Proprietary charging only							
	Lesser of		Lesser of				
L2 Charger Incentive	**NVE Incentive per Port**	**% NVE funding**	**GOE Incentive Per Port**	**% GOE Funding**	**Min # of ports**	**Max # of ports**	**Max Inc. Per Project**
Governmental	$7,500	75%	$2,500	25%	2	4	$40,000
Lower-income Multi-family housing	$7,500	75%	$2,500	25%	2	4	$40,000

Example: Incentive funding could be covered up to 100% (75% NV Energy and 25% Governor's Office of Energy). An Applicant proposes a system with two (2) Level 2 charging units with 2 ports each for a total of four (4) charging ports. The initial calculation for allows for an incentive up to $7,500 per port from NV Energy ($7,500 x 4 = $30,000) and up to $2,500 per port from the Governor's office of Energy ($2,500 x 4 = $10,000). In this example, the total incentive would be $40,000 which is also the maximum incentive allowed per project.

5.2. Proprietary Charging

Level 2 chargers that can only charge one individual vehicle make can be incentivized in non-public charging categories.

	Max # of Proprietary Ports	**Number of Proprietary Ports Authorized**								
Number of Total Ports		**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**
Fleet	10	2	3	4	5	6	7	8	9	10
Multifamily	5	1	1	2	2	3	3	4	4	5
Workplace	3	1	1	2	2	2	2	3	3	3
Lower-Income Multifamily	2	1	1	2	N/A	N/A	N/A	N/A	N/A	N/A
Public	0	0	0	0	0	0	0	0	0	0
Governmental	0	0	0	0	0	0	0	0	0	0

6. APPLICATION PROCESS

6.1. Application Submittal

Applications are submitted online through NV Energy's online application portal and can be accessed here: PowerClerk. The application will be available to open and submit on the Program Launch Date.

Applications are reviewed to confirm Host Customer program eligibility and affirm that required documentation is provided.

Important communications are sent by email to program participants. Accurate email addresses are required for ALL program participants, including Host Customers.

Deficient applications will be returned to the Applicant for corrections. Deficient applications that are not corrected within 20 days of the Applicant being notified of the deficiency are canceled and the application fee is forfeited.

A commercial application must include:

- Manufacturer's specifications for proposed charging equipment.
- Copy of the Business License for the installation location. If the installation location does not have a business license, then valid eligibility documentation can include a business brochure, pending business license, business plan, or other document to demonstrate the installation project is for a workplace, multi-family housing complex, commercial electric vehicle fleet, or public charging location.
- Site plan.

A residential application must include:

- Applicants must provide the make, model, date and year of EV acquired. The EV must have been acquired within 60 days of the application. A verification of the current EV vehicle registration must be submitted with the application documents and be in the applicant's name and address prior to payment of the incentive. An applicant is ineligible for any incentive if the EV is not acquired within 60 days of the incentive application, either earlier or after.

6.2. Application Fee

A $35 non-refundable fee is required for all Applicants. The fee must be received by NV Energy before the application will be reviewed and approved. Applications are reviewed when fees are received. Since the fee may be paid by the customer or any other participant in the application, customers should communicate with installation partners before submitting payment. If NV Energy receives duplicate fee payments for the same application, the first payment is posted, and subsequent payments are returned. If the fee is not received within 30 days of submission of the application, the application will be cancelled.

Application fees may be paid online using SpeedPay (must be an NV Energy account holder to use) or application fees may be mailed to:

NV Energy Clean Energy Programs
6100 Neil Road
MS S2A35
Reno, NV 89520
Your application number, provided once you submit an application, must be referenced on the payment method of your choice.

6.3. Reservation Notice

Once an application has been reviewed and approved, a Reservation Notice is sent to the Applicant, Host Customer, Installer and System Owner via email that indicates that incentive funds have been reserved for the Project. The notice lists the type and quantity of electric vehicle chargers. The Host Customer has sole rights to the Reservation Notice. The incentive reservation notice is valid for 365 days from the date of issuance.

Applicants may check the status of their application by signing into the online application portal. "Active" status indicates that a Reservation Notice has been issued.

Applicants must not begin the installation of the proposed electric charging system until the Reservation Notice has been issued. While preparatory work may be in progress (including project design, permitting, equipment procurement and "make-ready" construction), a project will be ineligible for incentive if the installation of the proposed electric charging system begins before the Reservation Notice has been issued.

6.4. Application Changes

Installation Location: Changes may require submission of new documents and requalification. Applicants and Host Customers may request to change the installation address of a reservation to another address with the same Host Customer. Changes must be requested in writing to NV Energy. Location changes will require that the Applicant provide a copy of a recent NV Energy bill for the proposed location. The new installation location is recorded in the online application, but the Reservation Notice is not revised. The terms of the original Reservation Notice apply to the new installation location.

Applicant or Installer: Host Customers may change or rescind affiliation with any of the parties of the original application with written notice to NV Energy. The Installer may be changed by either the Applicant, System Owner or the Host Customer with written notice to NV Energy.

Host Customer: The Host Customer name for an application may be changed before Project completion by the original Host Customer with written request to NV Energy. A copy of a recent utility bill in the name of the new Host Customer must be provided with the change request.

Reservation Notice: Reserved incentives listed on the Reservation Notice cannot be changed. Applicants may withdraw the existing application and submit a new application at their discretion. New applications are subject to incentive levels and the availability of incentive funds at the time of the new application and must comply with current rules. New Applications require a new non-

refundable $35 application fee, and a new Reservation Notice will be sent.

7. INCENTIVE CLAIM

The Applicant requests payment of the incentive for a Completed Project by submitting the incentive claim package prior to the expiration date listed on the Reservation Notice. The incentive claim is submitted through NV Energy's online application portal, similar to submitting the original application. The final incentive is determined by the actual installed system and may not exceed the amount listed on the Reservation Notice.

If an incentive claim package is incomplete and suspended, the Applicant has 60 days to make corrections. If the correction is not received within the first 30 days, NV Energy will send a final notice indicating that the Applicant has 30 days to correct or their application will be forfeited. In the case that an incentive application is forfeited the system may still be connected but the reserved incentive funds and the application fee are forfeited.

The incentive claim must include the following:

- **Signed Incentive Claim Form:** If an Applicant changes system details from those originally proposed, then the Applicant must modify the system details in the Incentive Claim Form.
- **Invoices:** Copy of the final invoice(s) for installation and equipment. NV Energy will validate declared system costs by comparing the invoice to the as-built system. Random Projects may be selected for onsite or virtual inspection.
- **Building Permits:** If applicable, a copy of the satisfied building permit from the local jurisdiction indicating the date of satisfactory final system inspection. (In the case of jurisdictions that do not have a building official, verification by a Nevada licensed professional engineer is required attesting to compliance with all applicable state, county, and federal codes and ordinances.)
- **Pictures:** Photos of the installed EV charging station(s) that clearly show the Completed Project and equipment nameplate information.
- **Pictures:** Photos of chargers installed at Communal parking spaces for multi-family and lower-income multi-family incentive categories.

8. INSPECTIONS

Projects may be selected randomly for inspection, and NV Energy may inspect other existing projects at its discretion. The program post inspection verifies the information contained in the incentive claim, including:

- Installation location.
- Installed equipment.
- Verification that the final installation invoice matches what was installed and listed in the application.

If the program post inspection identifies any information or conditions that need to be corrected or verified by the Host Customer or contractor, NV Energy will notify the Host Customer and Contractor of the required corrections. Once those corrections are made, NV Energy will confirm the corrections have been made and continue processing the Incentive Claim.

9. INCENTIVE PAYMENT

Incentive payments are processed only after installation and submittal of the incentive claim package. Payments are issued to the payee as indicated on the Incentive Claim Form. Payees must provide NV Energy with a W-9 Form in the same name as the payee on the online application. To protect payee privacy, W-9 forms are not submitted in the incentive claim but are submitted directly to NV Energy. Incentive payments are not made until the W-9 is provided.

10. CANCELLATION, WITHDRAWAL AND FORFEITURE

Cancellation: An application that has not yet been approved and issued a Reservation Notice may be cancelled by written or verbal request from the Applicant, Installer, System Owner or Host Customer.

Withdrawal: An application that has been issued a Reservation Notice may be withdrawn from the program by written request directly from the Host Customer to NV Energy. A Withdrawal Form is available in the online application portal.

Forfeiture: An application is forfeited if the complete incentive claim is not submitted by the expiration date listed on the Reservation Notice.

Reserved incentive funds for withdrawn and forfeited applications are returned to the program and these applications are no longer eligible for payment to the Applicant. Host Customers may reapply to the program, but subsequent applications are subject to the program rules in place at the time of the new application.

11. CONTACT INFORMATION

More information on NV Energy's programs and services can be found on our website at nvenergy.com.

Website: Electric Vehicles
Email: cleanenergy@nvenergy.com
Toll-Free: 866-786-3823
Fax: 775-402-0339

Application Portal: PowerClerk

Attachment DK-18

Lower Income Electric Vehicle Rebate

Program Handbook

July 1, 2022 – June 30, 2023

Funding for the Electric Vehicle Infrastructure Demonstration (EVID) program has been fully reserved. Applications that have not already received a reservation notice will instead receive a conditional reservation notice upon application approval. Projects may begin construction upon receiving a conditional reservation notice, but funds are not guaranteed until a reservation notice has been issued.

PROGRAM WELCOME & OVERVIEW

Welcome to the PowerShift by NV Energy Lower Income EV Rebate Program (hereinafter Program). You are joining a growing number of Nevadans committed to a sustainable and clean energy environment and for that we thank you!

This Program has you in mind as we work together to increase the adoption of EVs throughout our communities and provide financial support to NV Energy customers that offsets the cost of purchasing an EV.

Inside this handbook you will find helpful guidance and information about how to apply and qualify for Program rebates.

NV Energy customers who meet income eligibility guidelines can apply to receive a $2,500 rebate on the purchase or intended purchase of a qualifying new or used electric vehicle (EV) or plug-in hybrid. This rebate offer is available to 100 Customers on a first-come, first served basis through June 30, 2023.

Thanks again for your commitment to supporting a sustainable and clean energy environment. And when you save energy you help preserve our natural resources for generations to come.

Please feel free to contact us for more information or with any questions at 866-786-3823 or via email at cleanenergy@nvenergy.com.

Sincerely,

The PowerShift Clean Energy Team

CONTENTS

Version No.	Date	Description
2	04/20/2022	Poverty Guidelines Updates
3	06/28/2022	PY '22 Date & Logo Update
4	09/12/2022	Funding Fully Reserved Update

1. DEFINITIONS

This section includes a list of commonly used acronyms and terms found throughout this handbook.

Applicant or Customer: The NV Energy customer of record at the residence. The Customer name must exactly match the name on the NV Energy bill. The Customer is responsible for making any changes to their NV Energy bill prior to application. Persons listed as co-Customers on the NV Energy bill may apply as the Customer. The Customer also must be the person who purchased the EV. The name on the EV Proof of Purchase and the Vehicle Registration must match the NV Energy account holder's name or the NV Energy account co-Customer's name.

Application: The initial form to be completed by the customer wherein the project information is provided. The Application is then reviewed, and the customer is notified if additional information is needed.

Application Corrections: Requested by the reviewer if the Application is missing documentation or information necessary for approval.

Completed: The Lower Income Electric Vehicle Rebate Application is considered completed when the Electric Vehicle is purchased, and the claim is finalized.

Customer: The NV Energy customer of record at the residence. The Customer name must exactly match the name on the NV Energy bill. The Customer is responsible for making any changes to their NV Energy bill prior to application. Persons listed as co-Customers on the NV Energy bill may apply as the Customer. The Customer also must be the person who purchased the EV. The name on the EV Proof of Purchase and the Vehicle Registration must match the NV Energy account holder's name or the NV Energy account co-Customer's name.

Dealer: Establishment which sells and advertises the sale of new or used vehicles who carries a Nevada auto dealer license.

Electric Vehicle or EV: Any vehicle that uses electric motors for propulsion.

Rebate Claim Corrections: If the Rebate Claim Package is missing any documentation or information, NV Energy may ask the customer to provide the information so the rebate can be paid.

Rebate Claim Package: The final set of forms to be completed in the application process wherein final documentation is provided and project costs are established.

NV Energy: Referred to as the Company or NV Energy.

Plug-in Hybrid Electric Vehicle or PHEV: Any vehicle that uses an internal combustion engine and electric motors for propulsion whose battery can be recharged by plugging a charging cable into an external power source.

Project Administrator: Individual in charge of the application and claim reviewal.

PowerClerk: NV Energy's online portal for Clean Energy program applications.

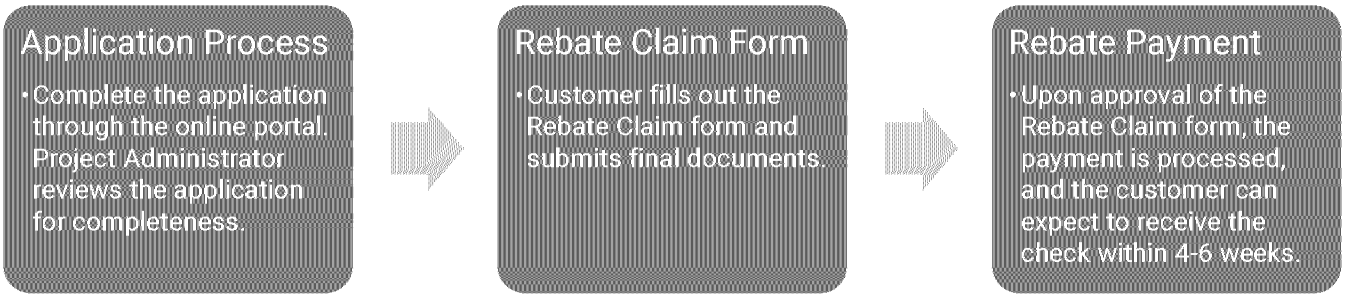
PowerShift by NV Energy's Lower Income Electric Vehicle Rebate Program: Hereinafter referred to as the Program.

Reservation Notice: The Reservation Notice is issued upon final approval of the application by NV Energy. It will confirm the application number, the application type, the residence address, the date of reservation, the expiration date of the reservation, and the amount of the rebate funds held for the customer. The Reservation Notice expires three months from the date of issuance.

2. APPLICATION PERIOD

Applications will be accepted through NV Energy's online application portal through June 30, 2022. The Customer must complete the purchase of a qualifying electric vehicle within the 60 days before the application has been submitted, but no earlier than January 1, 2022. The Customer has 60 days after the Reservation Notice has been issued to purchase their vehicle. The Rebate Claim form must be submitted by the expiration date listed on the Reservation Notice. If the Customer fails to submit the Rebate Claim form by the expiration date listed on the reservation, the reservation is forfeited and ineligible for the rebate payment.

FIGURE 1. REBATE APPLICATION PROCESS



3. CUSTOMER ELIGIBILITY

The following requirements must be met to be eligible for the Lower Income EV rebate:

- The applicant for this rebate must be the NV Energy customer of record or a co-applicant on the NV Energy account.
- Applicant must be a lower income customer.
- To qualify as a lower income customer, the combined household income must be at or below 200 percent of Federal Poverty Level or Federal Poverty Indices. The 2022 Poverty Guidelines can be found here.
- Applicant must be a Nevada resident (with a valid and current Nevada Driver's License or Nevada ID issued by the Nevada Department of Motor Vehicles).
- The rebate must be used toward the purchase of a new or used EV with a battery capacity of 10 kilowatt-hours (kWh) or more.
- The EV must have a base manufacturer's suggested retail price of less than $50,000.
- The EV must be purchased through a licensed vehicle dealer or an original EV manufacturer.
- Person-to-person or private sales are not eligible for the rebate.
- Leased EVs are not eligible for the rebate.
- An applicant is ineligible if the purchase was completed prior to January 1, 2022.
- An applicant will be ineligible for the rebate if their EV purchase is not completed within 60 days of their approved application, and.
- In the event the applicant owns or intends to purchase a Level 2 charger, they must give NV Energy consent to access their Level 2 charger energy usage information.

4. APPLICATION PROCESS

Applications are submitted online through NV Energy's online application portal and can be accessed here: PowerClerk. Customers will be able to create and edit applications as needed.

4.1. Application Submittal

All Lower Income Electric Vehicle Charging Rebate Applications and documentation must be submitted through the online application portal PowerClerk. Any other form of submission will not be accepted.

To begin the Application, the Customer must register for a PowerClerk account. As soon as the account has been confirmed, the application process may begin.

Duplicate applications or multiple submissions for the same project will be rejected. Project Administrators review applications based on a first-come first-serve basis in the order submitted. Upon application approval, a reservation notice will be issued to the Customer.

Applications are reviewed within 10 business days to confirm Customer program eligibility and that the required documentation is provided. Important communications are sent by email to program participants. Accurate email addresses are required for ALL program participants.

4.2. Required Documentation

You can complete and submit your application with the rebate timeline and guidelines for a new or used qualifying EV or hybrid plug-in you have purchased or intend to purchase as outlined in the Customer Eligibility section. In the event you have not yet purchased the vehicle but intend to do so, you can submit your application to reserve your rebate prior to completion of your purchase. After the purchase has been completed, you will be required to submit the remaining documents to finalize receipt of your rebate.

To be eligible for the Lower Income EV rebate, a copy of the following documents must be provided to NV Energy:

- Proof of Nevada residency: a valid Nevada Driver's license or Nevada ID issued by the Nevada Department of Motor Vehicles is required.
- One NV Energy bill in the customer's name from the past three months.
- W-2 or Social Security Statement from 2021 or 2022 (please block out your Social Security Number).
- Vehicle registration: this is the registration issued by the Nevada Department of Motor Vehicles. This must show the customer's name as the operator of the EV and the residence address as the customer's address.

- EV proof of purchase: this document MUST show the customer's name as the owner of the vehicle. The date the EV was purchased must also be on the document. Eligible documents include the following:
    - Dealer Bill of Sale.
    - Certificate of Title.
    - Electronic Dealer, Rebuilder or Lessor's Report of Sale or Lease.
- Photo of the purchased EV.
- Photo of the Vehicle Identification Number (VIN).
- Photo of the license plate.

If the Customer fails to purchase the Electric Vehicle and submit the Rebate Claim form by the expiration dates listed on the Reservation Notice, the expired reservation is forfeited and no longer eligible for a rebate payment.

4.3. Application Fee

There is no application fee required for the Program.

4.4. Rebate Reservation

NV Energy will review applications in the order in which they are received via the online portal. Correct and complete applications will receive a rebate Reservation Notice and will include the following information: application number, the application type, the residence address, the date of reservation, the expiration date of the reservation, and the amount of the rebate funds held for the Customer.

Customers may change their residence address on an active reservation to another Nevada residence address, if the information provided is for the same customer. The new residence location will be recorded in the online application, but the reservation notice will not be revised. The terms of the original Reservation Notice would apply to the new residence location. A customer may withdraw a reservation at any time, with a written request to NV Energy.

4.5. Application Changes

If the application is deemed incomplete or lacking documentation, the reviewer will request application corrections to be submitted by the Customer. The Customer must resubmit the application with corrections within 20 calendar days for re-review. Deficient Applications that are not corrected within 20 calendar days of the Customer being notified of the deficiency are canceled.

Customer Changes: The Customer name for an application may be changed by the original Customer when submitting the Rebate Claim form.

5. REBATE CLAIM

5.1. Rebate Claim Process

To request the rebate, a Rebate Claim form must be filled out and submitted in the online application portal within three months or 90 days of the application approval. The Rebate Claim form must be filled out after the purchase of the designated EV and prior to the expiration date listed on the Reservation Notice. Once submitted, Rebate Claims are reviewed within 10 business days, and the customer is notified via email if the claim has been approved. If the Rebate Claim Form is submitted after the expiration of the Rebate Reservation Notice or the electric vehicle is not purchased, the rebate is forfeited.

5.2. Rebate Claim Corrections

If a Rebate Claim is missing any required information or requires additional clarification, the reviewer will request Rebate Claim Corrections. The Customer must supply the documentation or clarifications necessary for re-review within 60 calendar days.

If the correction is not received within the first 30 days, NV Energy will send a final notice to the Customer advising them that corrections must be submitted, or their application will be forfeited.

6. REBATE PAYMENT

Once the reviewer processes and accepts the Rebate Claim Form corrections, the rebate payment will be issued by NV Energy.

Note: Customers who have enrolled in data sharing must allow NV Energy to have access to their existing charger's session data for a period of three (3) years. Customers may be required to refund some or all of the rebates they have received if the charger ceases to share data and does not reconnect.

7. CANCELLATION, WITHDRAWAL AND FORFEITURE

Upon customer verbal or written request to NV Energy, an application may be cancelled or withdrawn.

An application is forfeited if the complete Rebate Claim form is not submitted by the expiration date listed on the Reservation Notice.

Reserved funds for withdrawn, cancelled, and forfeited applications are returned as available to the Program. Customers may reapply to the program, but subsequent applications are subject to the Program rules in place at the time of the new application.

8. CONTACT INFORMATION

For additional information and to find out more about PowerShift by NV Energy's products and services, contact us as follows:

Visit: Electric Vehicles
Email: cleanenergy@nvenergy.com
Call: 866-786-3823

Application Portal: PowerClerk

Attachment DK-19

powershift by NVEnergy

Residential Electric Vehicle Charging Incentives

Program Handbook

July 1, 2022 – June 30, 2023

powershift by NVEnergy

PROGRAM WELCOME & OVERVIEW

Welcome to the PowerShift by NV Energy Residential Single-Family EV Charging Incentive Program (hereinafter Program). You are joining a growing number of Nevadans committed to a sustainable and clean energy environment and for that we thank you!

This Program has you in mind as we work together to increase the adoption of EVs throughout our communities and provide financial support to NV Energy customers that offsets the cost(s) of purchasing and installing an EV charger for their residence.

Inside this handbook you will find helpful guidance and information about how to apply and qualify for Program incentives.

The Program offers several incentives for which you can qualify, and they are as follows: an incentive of up to $500 or 75% of project costs when an NV Energy customer consents to sharing charging data and use a qualified charger; and $250 or 75% of project costs when the customer does not provide consent. Applications are reviewed and approved on a first-come first-serve basis up to the first 1,000 paid customers.

Thanks again for your commitment to supporting a sustainable and clean energy environment. And when you save energy you help preserve our natural resources for generations to come.

Please feel free to contact us for more information or with any questions at 866-786-3823 or via email at cleanenergy@nvenergy.com.

Sincerely,

The PowerShift Clean Energy Team

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CONTENTS

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1. DEFINITIONS

This section includes a list of commonly used acronyms and terms found throughout this handbook.

Application: The initial form to be completed by the customer wherein the project information is provided. The Application is then reviewed and the customer is notified if additional information is needed.

Applicant: The party responsible for preparing the Application and Incentive Claim Package in the online application portal, typically the NV Energy Host customer of record.

Application Corrections: Requested by the reviewer if the Application is missing documentation or information necessary for approval.

Connector: The physical plug inserted into the vehicle receptacle.

Dealer: The company which sells and advertises the sale of new or used vehicles.

Electric Vehicle or EV: Any vehicle that uses electric motors for propulsion.

Host Customer: The NV Energy customer of record for the proposed installation location is also known as the Host Customer. The Customer name must appear exactly as the name on the NV Energy account and billing information. The Customer is responsible for making any changes to their NV Energy bill prior to application. Persons listed as co-Applicants on the NV Energy bill may apply as the Customer.

Incentive Claim Corrections: If the Incentive Claim Package is missing any documentation or information, NV Energy may ask the customer to provide the information so the incentive can be paid.

Incentive Claim Package: The final set of forms to be completed in the application process wherein final documentation is provided and project costs are established.

NV Energy: Referred to as the Company or NV Energy.

Plug-in Hybrid Electric Vehicle or PHEV: Any vehicle that uses an internal combustion engine and electric motors for propulsion wherein the battery is recharged by plugging a charging cable into an external power source.

Port: A charging connection to the electric vehicle which is capable of independently charging an electric vehicle simultaneously with any other port.

PowerClerk: NV Energy's online portal for Clean Energy program applications.

Project Administrator: Individual in charge of the application and claim reviewal.

PowerShift by NV Energy's Residential Single-Family Electric Vehicle Charging Incentive Program: Hereinafter referred to as the Program.

Reservation Notice or Reservation: The Reservation Notice is issued upon final approval of the

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application by NV Energy. It will confirm the amount of the incentive funds held for the customer, the installation address, output power and brand of EV charging system. The Reservation Notice expires one year from the date of issuance.

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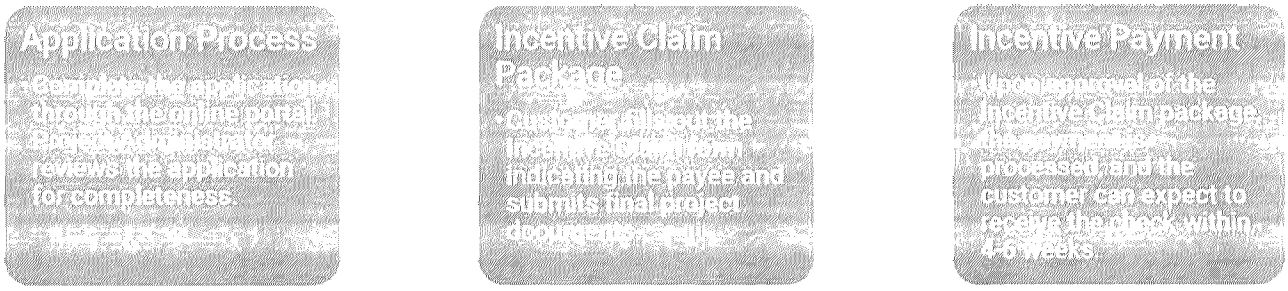
2. APPLICATION PERIOD AND SELECTION DATES

Applications will be accepted through NV Energy's online application portal July 1, 2021 – June 30, 2022. The Applicant must complete the purchase of a qualifying electric vehicle within 60 days before or after the initial application is submitted. The Incentive Claim Package must be submitted by the expiration date listed on the Incentive Reservation Notice. If the Applicant fails to submit an Incentive Claim Package by the expiration date listed on the reservation, the reservation is forfeited and ineligible for the incentive payment.

FIGURE 1. INCENTIVE APPLICATION PROCESS



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3. CUSTOMER ELIGIBILITY

The Customer must provide proof of vehicle purchase either 60 days prior or 60 days after application submittal.

Proof of vehicle purchase includes:

- Title provided by the dealership or any other documentation provided demonstrating ownership such as:
    - DMV Electronic Dealer, Rebuilder or Lessor's Report of Sale or Lease.
- Vehicle registration:
    - This should display the Applicant's name (host customer) and address.
    - The vehicle's make, model, and date and year acquired.

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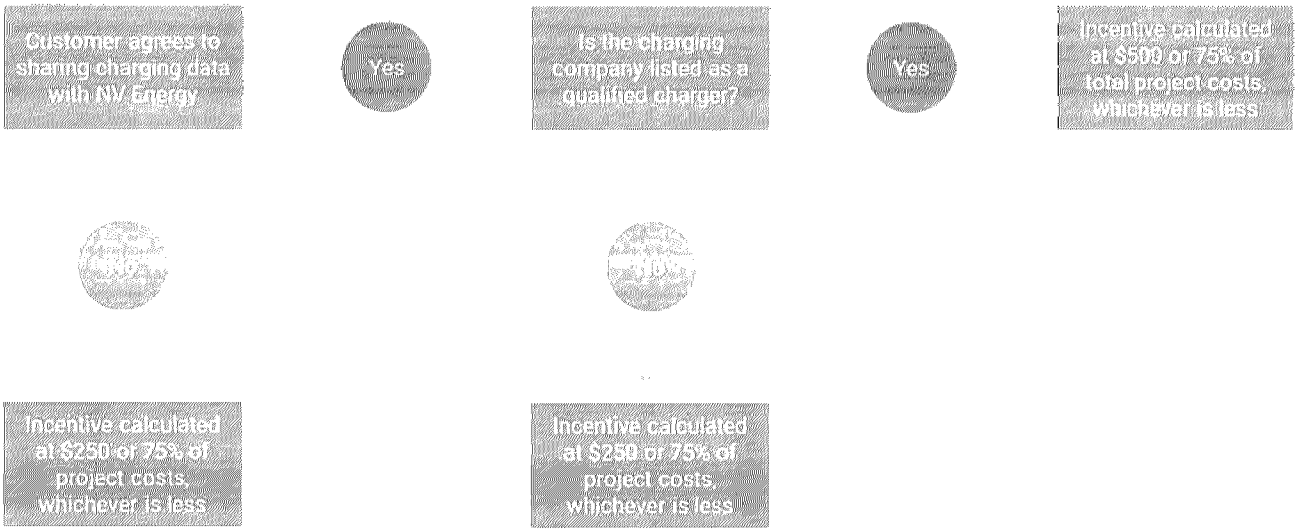
4. INCENTIVES

The incentive will be provided to the first 1,000 NV Energy customers who meet qualifying guidelines. Incentives are $500 or $250. The customers who provide NV Energy access to their charging data and a utilize an NV Energy qualified charger will receive a higher incentive. Please refer to NV Energy's website for a current list of qualified chargers.

FIGURE 2. INCENTIVE FLOW CHART



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5. APPLICATION PROCESS

Applications are submitted online through NV Energy's online application portal and can be accessed here: PowerClerk. Customers will be able to create and edit applications as needed.

If a customer purchases or installs the charger prior obtaining a notice of reservation, this is acceptable as long as they have acquired the EV within 60 days of application submittal date to NV Energy.

5.1. Application Submittal

All Residential Electric Vehicle Charging Incentive Program Applications and documentation must be submitted through the online application portal PowerClerk. Any other form of submission will not be accepted.

To begin the Application, the customer must register for a PowerClerk account. As soon as the account has been confirmed, the application process may begin.

Duplicate applications or multiple submissions for the same project will be rejected. Project Administrators review applications based on a first-come first-serve basis in the order submitted. Upon application approval, a reservation notice will be issued to the customer.

Applications are reviewed within 10 business days to confirm Customer program eligibility and that they the required documentation is provided. Important communications are sent by email to program participants. Accurate email addresses are required for ALL program participants.

5.2. Required Documentation

An application must include:

- Vehicle Proof of Purchase with the vehicle's make, model, and date and year acquired.
- Vehicle Registration displaying the Applicant's name and address.
- Documentation of proposed equipment costs (i.e., quotes, estimates for purchase and installation).

Note: Vehicle Proof of Purchase and Vehicle Registration will not be mandatory in the initial application process if the vehicle has not been purchased however the vehicle should be purchased and/or delivered within 60 days before or after the initial Application is submitted.

If the Host Customer fails to purchase the Electric Vehicle and submit the Incentive Claim Package by the expiration date listed on the Incentive Reservation Notice, the expired reservation is forfeited and no longer eligible for an incentive payment.

Utility Bill: If NV Energy service has not been established, as in new construction or pending transfer of property title, the Applicant may submit, in place of the utility bill, a document indicating future service with the Host Customer's name and the physical address of the property as it will appear on the NV Energy account (utility bill). NV Energy service must be established before the system can be paid an incentive. To demonstrate that service has been established, a copy of a recent utility bill or accurate NV Energy account number must be provided with the incentive claim package.

5.3. Application Fee

A $35 non-refundable fee is required for all Applicants. The fee must be received by NV Energy within

30 days of submitting the application. Applications are placed in the review queue when the application fee is received and processed. If NV Energy receives duplicate fee payments for the same application, the first payment is posted, and subsequent payments are returned.

The fee may be submitted by check or electronically through the NV Energy ACI Worldwide payment portal, SpeedPay. The link to SpeedPay is provided in the application. The application number generated when the application is submitted must be written on checks and provided in SpeedPay. Application fee checks are not accepted prior to submission of an application. Cash is not accepted. SpeedPay is only available when an NV Energy account number exists. Residential and commercial new construction will not yet have an NV Energy account number, so SpeedPay will not be available; therefore, fee payments for new construction must be made by check.

Application fees may be paid online using SpeedPay (must be an NV Energy account holder to use) or application fees may be mailed to:
NV Energy Clean Energy Programs
6100 Neil Road
MS S2A35
Reno, NV 89520

Your application number, provided once you submit an application, must be referenced on the payment method of your choice.

5.4. Incentive Reservation

NV Energy will review applications in the order in which they are received via the online portal. Correct and complete applications will receive an Incentive Reservation Notice and will include the following information: application number, application type, residence address, date of reservation, expiration date of reservation, and maximum eligible incentive payment.

Applicants may change their residence address on an active reservation to another Nevada residence address, if the information provided is for the same customer. The new residence location will be recorded in the online application, but the reservation notice will not be revised. The terms of the original Reservation Notice would apply to the new residence location. A customer may withdraw a reservation at any time, with a written request to NV Energy.

5.5. Application Changes

If the application is deemed incomplete or lacking documentation, the reviewer will request application corrections to be submitted by the customer. The customer must resubmit the application with corrections within 20 calendar days for re-review. Deficient Applications that are not corrected within 20 calendar days of the applicant being notified of the deficiency are canceled and the Application fee is forfeited.

Host Customer Changes: The Host Customer name for an application may be changed before Project completion by the original Host Customer with written request to NV Energy. The new utility account number in the name of the new Host Customer must be provided with the change request.

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6. INCENTIVE CLAIM

6.1. Incentive Claim Process

To request the incentive, an Incentive Claim form must be filled out and submitted in the online application portal within three months or 90 days of the application date. The Incentive Claim form must be filled out after the purchase of the designated EV and prior to the expiration date listed on the Reservation Notice. Once submitted, Incentive Claims are reviewed within 10 business days, and the customer is notified via email if the claim has been approved. If the Incentive Claim Form is submitted after the expiration of the Incentive Reservation Notice or the electric vehicle is not purchased, the incentive is forfeited.

The Incentive Claim Package must include the following:

- Signed Incentive Claim Form.
- Any charger cost documentation: electrician costs (if applicable) and/or charger costs (invoice, receipts).
- Proof of ownership by submitting one of the following:
    - Copy of the final sales contract or DMV electronic dealer, rebuilder or lessor's report of sale, or lease showing the customer's name as the owner of the electric vehicle.

    OR
    - A copy of the vehicle's registration showing the customer's name and residence address.

6.2. Incentive Claim Corrections

If an Incentive Claim is missing any required information or requires additional clarification, the reviewer will request Incentive Claim Corrections. The applicant must supply the documentation or clarifications necessary for re-review within 60 calendar days.

If the correction is not received within the first 30 days, NV Energy will send reminder notices to the applicant advising them that corrections must be submitted, or their application will be forfeited. In the case that an incentive application is forfeited the system may still be connected, but the reserved incentive funds and the application fee is forfeited.

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7. INCENTIVE PAYMENT

Once the reviewer processes and accepts the Incentive Claim Form corrections the incentive payment will be issued by NV Energy.

Note: Customers who have enrolled in data sharing must allow NV Energy to have access to their charging session data for a period of three (3) years. Customers may be required to refund some or all of the incentives they have received if the charger ceases to share data and does not reconnect.

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8. CANCELLATION, WITHDRAWAL AND FORFEITURE

Upon customer verbal or written request to NV Energy, an application may be cancelled or withdrawn.

An application is forfeited if the complete claim is not submitted by the expiration date listed on the Reservation Notice or the date granted for the extension.

Reserved funds for withdrawn, cancelled and forfeited applications are returned as available to the Program. Host Customers may reapply to the program, but subsequent applications are subject to the Program rules in place at the time of the new application.

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9. CONTACT INFORMATION

For additional information and to find out more about PowerShift by NV NV Energy's products services contact us as follows:

Visit: Electric Vehicles
Email: cleanenergy@nvenergy.com
Call: 866-786-3823

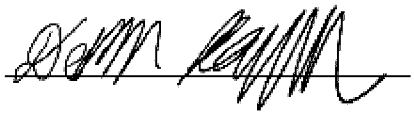
Application Portal: PowerClerk

AFFIRMATION

I, Deborah Kapiloff, do hereby declare under penalty of perjury that the foregoing document is true and correct.

That I am the person identified in the attached Direct Testimony and that such testimony was prepared by me or under my direct supervision; that the answers and information set forth therein are true to the best of my knowledge and belief; and that if asked the questions set forth therein, my answers thereto would, under oath, be the same.

Dated October 4, 2024



Deborah Kapiloff

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CERTIFICATE OF MAILING

Docket No. 24-05041

I hereby certify that I have on this date served the foregoing document upon all parties of record in this proceeding by electronic mail to the recipient's current electronic mail address, facsimile, or mailing a true copy thereof, properly addressed with postage prepaid or forwarded as indicated below to:

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DATED October 4, 2024.

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