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24-05041

Public Utilities Commission of Nevada  
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October 10, 2024

Trisha Osborne, Assistant Commission Secretary  
State of Nevada Public Utilities Commission  
1150 East William Street  
Carson City, NV 89701

**RE: Docket No. 24-05041 – Errata to Meera Fickling’s Direct Testimony**

Dear Ms. Osborne:

On October 8, 2024, Western Resource Advocate’s witness, Meera Fickling, filed Direct Testimony in the above referenced docket. In order to address minor revision to values in two tables in the testimony, attached is an Errata which replaces Ms. Fickling’s Direct Testimony pages 19, 20, and 21. The additions/changes do not impact any underlying conclusions or recommendations and are underlined and in bold.

If you have any questions, please contact me directly.

/s/Hunter Holman

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relatively stable, at \$0.58 per kWh for NV Power and \$0.95 per kWh for SPPC during the plan period, compared with \$0.54 and \$0.82 respectively in 2023.<sup>46</sup>

**31. Q: What recommendations do you have for NVE's DSM Plan preferred portfolio?**

**A:** At a high level, I would recommend that the Commission direct NVE to target a 1.0% energy savings goal from 2025-2027. This is consistent with recent historical program achievement, and the Companies have not, in my view, sufficiently justified why this savings level is no longer achievable moving forward. Even without a robust evaluation of energy savings opportunities from data centers, and even while restricting the universe of potential measures to those achieving an nTRC of 1 or better, the MPS projects achievable savings close to this level. Additionally, a 1.0% savings target is necessary to maintain NVE's current level of GHG emissions reductions from its energy efficiency programs, fulfilling a key goal identified by stakeholders.

Specifically, I recommend the following annual savings goals for Nevada Power, SPPC, and NV Energy:

**Table MF 2. WRA Proposed Annual Savings Goals**

	<b>2025</b>	<b>2026</b>	<b>2027</b>
<b>Savings (kWh)</b>			
NPC	250,182,952	263,217,211	278,917,579
SPPC	84,806,076	87,924,296	<b><u>89,178,716</u></b>
NVE Total	334,989,028	351,141,507	<b><u>368,096,294</u></b>
<b>Savings (%)</b>			
NPC	1.12%	1.15%	1.18%
SPPC	0.76%	0.72%	<b><u>0.68%</u></b>
NVE Total	1.00%	1.00%	1.00%

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<sup>46</sup> *Id.*

1 Meanwhile, the Commission should approve the demand response targets proposed in  
2 the Grid Value portfolio. NVE is correct that the increase it proposes for these programs  
3 is necessary for the Companies to adapt to rapidly growing loads and avoid further  
4 buildout of fossil generation capacity.

5 **32. Q: How do you propose that the Companies achieve the savings shown above?**

6 **A:** Mainly by reducing the acquisition cost of the Business Energy Services and Energy Smart  
7 Schools programs to 2023 and 2024 historical levels. Assuming the Companies can  
8 maintain the historical acquisition cost for these two programs through 2027, they can  
9 achieve up to 0.95% combined savings in 2025 and 0.93% combined savings in 2027,  
10 without any change in budget to the Grid Value portfolio.

11 To achieve the remaining 0.05% incremental savings, I increased the BES budget  
12 for SPPC only, using an escalation factor of 1.5 in 2025, 1.55 in 2026, and 1.55 in 2027.  
13 Assuming a historical acquisition cost, this enables BES program savings of 59.4 GWh  
14 in 2025, 61.4 GWh in 2026, and 61.4 GWh in 2027 for SPPC. These augmented savings  
15 targets are consistent with the Companies' MPS, which estimates that there are 58 to 62  
16 GWh of annual commercial lighting savings alone achievable in SPPC's service  
17 territory.<sup>47</sup>

18 **33. Q: How much would this recommendation cost to implement?**

19 **A:** I recommend maintaining a similar budget as the Grid Value portfolio for Nevada Power  
20 and increasing the budget for SPPC, as follows:<sup>48</sup>

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<sup>47</sup> Volume 18 at 139, Table 56.

<sup>48</sup> This budget also accounts for revised AC and heat pump incentives described in Section 3.

**Table MF 3. WRA Proposed Annual Budgets**

	2025	2026	2027
NPC	53,460,124	59,178,783	66,428,164
SPPC	22,545,707	24,642,694	<b><u>26,752,810</u></b>
Total	76,005,831	83,821,477	<b><u>93,180,974</u></b>

**34. Q: What impact would this recommendation have on rates?**

**A:** This testimony does not provide a rate impact analysis of its recommended savings goals. Nevertheless, the Companies' rate impact analysis of its proposed portfolios gives reason for optimism that the rate impact of this proposal will be net-negative for both residential and commercial customers in the medium term. The Grid Value portfolio has a modest near-term rate impact between 2025-2027 of \$0.002 to \$0.0039 per kWh for both utilities and all customer classes. Over the medium term, between 2028 and 2032, the net rate impacts of all three portfolios the Companies analyze—the Traditional Portfolio, the preferred portfolio, and a “Proposed + 20% DSM” portfolio—are either negative or small. The medium-term rate impact of the Grid Value Portfolio, for example, ranges from -\$0.0003 for industrial customers to -\$0.0020 for residential Nevada Power customers.<sup>49</sup> Given that my proposed portfolio exceeds the cost of the Grid Value portfolio by only 2% over the three-year period while delivering significantly greater energy savings, I expect that my portfolio will likely have medium- and long-term benefits for ratepayers by avoiding energy consumption and grid investments.

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<sup>49</sup> Errata No. 2\_Volume 1 of 2, at 37.

# 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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