



CASE NO: A-25-934678-A
Department 18

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**IN THE EIGHTH JUDICIAL DISTRICT OF THE STATE OF NEVADA
IN AND FOR CLARK COUNTY**

STATE OF NEVADA, OFFICE OF THE
ATTORNEY GENERAL, BUREAU OF
CONSUMER PROTECTION,

Case No.:

Petitioner,

Dept. No.:

vs.

PUBLIC UTILITIES COMMISSION OF
NEVADA,

Respondent.

PARTIES OF RECORD BELOW:

STATE OF NEVADA, OFFICE OF THE
ATTORNEY GENERAL, BUREAU OF
CONSUMER PROTECTION; NEVADA
POWER COMPANY d/b/a NV ENERGY and
SIERRA PACIFIC POWER COMPANY d/b/a
NV ENERGY; NEVADA COGENERATION
ASSOCIATES #1 AND #2, LIMITED
PARTNERSHIP; GOOGLE LLC; NEVADA
SOLAR ASSOCIATION; WALMART, INC.;
WYNN LAS VEGAS, LLC; SMART
ENERGY ALLIANCE; SOUTHERN
NEVADA GAMING GROUP (consisting of
BOYD GAMING CORPORATION,
STATION CASINOS LLC AND VENETIAN
LAS VEGAS GAMING, LLC); SOLAR

1 ENERGY INDUSTRIES ASSOCIATION;
2 VOTE SOLAR; MGM RESORTS
3 INTERNATIONAL; SOUTHERN NEVADA
4 WATER AUTHORITY; CAESARS
5 ENTERPRISE SERVICES, LLC;
6 NEVADANS FOR CLEAN AFFORDABLE
7 RELIABLE ENERGY; NEVADA WORKERS
8 FOR CLEAN AND AFFORDABLE
9 ENERGY; THE KROGER COMPANY;
10 FEDERAL EXECUTIVE AGENCIES; and
11 PUBLIC UTILITIES COMMISSION OF
12 NEVADA'S REGULATORY OPERATIONS
13 STAFF

9 PETITION FOR JUDICIAL REVIEW

10 1. Comes now, Petitioner, the State of Nevada, Office of the Attorney General,
11 Bureau of Consumer Protection ("BCP"), on behalf of Nevada ratepayers, in accordance with
12 Nevada Revised Statutes ("NRS") 228.308, 228.360, and 703.373, submits this Petition for
13 Judicial Review of the following Final Orders issued by Respondent, the Public Utilities
14 Commission of Nevada ("Commission" or "PUCN"), in consolidated Docket Nos. 25-02016 and
15 25-03006 ("Final Orders"):

- 16 • Modified Final Order entered on November 20, 2025
17 (<https://bit.ly/ModFinalOrder>); and
- 18 • Order on Reconsideration entered on November 20, 2025
19 (<https://bit.ly/ReconOrder>) (reaffirming, clarifying and modifying the Commission's
20 Order issued September 16, 2025) (<https://bit.ly/OrderSept2025>).

21 2. On February 18, 2025, Nevada Power Company d/b/a NV Energy ("NPC") filed
22 with the Commission an application, designated as Docket No. 25-02016, for authority to
23 adjust its annual revenue requirement for general rates charged to all classes of electric
24 customers. On March 4, 2025, Sierra Pacific Power Company d/b/a NV Energy ("SPPC") filed
25 with the Commission an application, designated as Docket No. 25-03006, filed under Advice
26 Letter No. 680-E, to implement Net Metering Rider-2025 Schedule No. NMR-2025 and to close
27 Net Metering Rider-405 Schedule No. NMR-405 to new customers (collectively NPC and SPPC
28 are hereinafter referred to as the "Companies").

1 structure in contravention of NRS 704.085 and to recover from ratepayers unreasonable
2 affiliate charges, and for SPPC to implement 15-minute NEM netting in contravention of the
3 statutory regime requiring monthly net metering.

4 8. The demand charge rate structure (if permitted to be implemented), the 15-
5 minute NEM netting methodology, and the approved affiliate charges result in rates that are
6 unjust, unreasonable, and unlawful in contravention of NRS 704.040, and undermine the
7 Commission's fundamental duty under NRS 704.001 to provide utility ratepayers with just
8 and reasonable rates.

9 9. Additionally, the Commission determined the \$2.7 million of affiliate charges
10 proposed to be recovered by NPC was reasonable.

11 10. However, the Commission's decision concerning affiliate charges is belied by the
12 record as the evidence in this docket demonstrates that NPC failed to provide any evidence,
13 let alone substantial evidence, sufficient to support the recovery of an aggregate of \$2.7
14 million.

15 11. Not only is the \$2.7 million in affiliate charges unsupported by actual charges, it
16 is also unreasonable and an unsupported monetary number, resulting in the Commission's
17 decision being arbitrary and capricious.

18 **CLAIMS**

19 12. The BCP asserts that ratepayer's substantial rights have been prejudiced
20 because the Commission's findings of fact, conclusions of law, and decisions included in the
21 Final Orders fail to meet the statutory standards set forth under NRS 703.373. Pursuant to
22 NRS 703.373(11), certain findings of fact, conclusions of law, and decisions regarding the
23 demand charge rate structure, 15-minute NEM netting, and approved affiliate charges
24 included in the Final Orders are:

- 25 (a) In violation of constitutional or statutory provisions;
- 26 (b) In excess of statutory authority of the Commission;
- 27 (c) Made upon unlawful procedure;
- 28 (d) Affected by other error of law;

1 **AFFIRMATION**

2 **(NRS 239B.030)**

3 The undersigned hereby affirms that this Petition for Judicial Review does not
4 contain the social security number of any person.

5 DATED this 10th day of December, 2025.

6 ERNEST D. FIGUEROA
7 Consumer Advocate

8 By: /s/ Michael T. Saunders
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