



EXHIBIT

400

VOLUME 2 of 2

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April 29, 2025

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

Re: Docket No. 24-12016

Dear Ms. Osborne:

Please find attached Exhibit 400, 400_BCP Prefiled Direct Testimony - Nichole Loar, Volume 2, uploaded on behalf of the Bureau of Consumer Protection in the above-referenced docket.

Should you have any questions regarding this Exhibit, please contact me at (775) 684-1164.

Sincerely,

ERNEST FIGUEROA
Consumer Advocate

/s/ Michelle Badorine
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CONTACT FILER REGARDING IMAGE CLARITY

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24-12016

**Public Utilities Commission of Nevada
Electronic Filing**

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In accordance with NRS Chapter 719,
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by: /s Jana Whitson

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BCP

BUREAU OF CONSUMER PROTECTION

DOCKET 24-12016

TESTIMONY OF NICHOLE LOAR

VOLUME 2 OF 2

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-18-2025
REQUEST NO:	BCP 7-01	KEYWORD:	NDPP Charges to GRC
REQUESTER:	BCP	RESPONDER:	Pinjuv, Jordan (NV Energy)

REQUEST:

Reference: LCB File No. R181-24 – Docket No. 19-06009

Question: According to Sec. 7 of the permanent regulation in Docket No. 19-06009, LCB File No. R181-24, filed with the Secretary of State on November 15, 2024, Sec. 12 (2) of LCB File No. R085-19 was amended as provided: “Sec. 7. Section 12 of LCB File No. R085-19 is hereby amended to read as follows:

...

4. An electric utility shall include in each general rate application filed pursuant to NRS 704.110 on or after March 2, 2025, a request to recover the cost of prudent and reasonable expenditures made by the electric utility to develop and implement any element of a natural disaster protection plan during the most recent 12 months for which data were available when the general rate application was prepared. The application must include a proposed separate rate to recover the costs from the customers of the electric utility through a uniform kilowatt-hour rate.”

1) The intent of this provision was to move NDPP charges that are made during the normal course of business (a new normal since the NDPP implementation in 2019) to a GRC. Please confirm or deny and explain in detail the Utilities’ understanding of the intent of this new provision.

2) Assuming the attempt of this provision was to move NDPP charges that are made during the normal course of business (a new normal since the NDPP’s inception in 2019) to a GRC, then please explain why there are amendment charges in the current Docket. Please also explain why the Utilities make no attempt to move charges which are part of the Utilities’ (both SPPC and NPC’s) normal course of business as part of a GRC and a component of the BTGR and instead requests all portions of this amendment in the NDPP rate.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

1. The Companies cannot confirm or deny the Commission's intent in adopting this provision, however, the Companies note that (1) this provision relates to the NDPP cost recovery mechanism that will be in place after March 2, 2025 and (2) the referenced subsection does not reference "normal course of business." NDPP cost recovery filings made after March 2, 2025 will be implemented through a GRC and the rate will be based on preceding 12-month charges consistent with the subsection referenced in BCP's data request.

2. NV Energy does not agree with BCP's assumption for the reasons set forth above. This First Amendment addresses modifications to the Companies' 2024-2026 Plan, consistent with Section 5 of LCB File No. R181-24. This filing does not request cost recovery and therefore does not implicate Section 7 of LCB File No. R181-24.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-08	KEYWORD:	Meteorology Interns
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 6-8 Meteorology Interns

Question: The Page 13 of Exhibit B states (in part), “[T]he adjusted incremental resource plan accommodates the anticipated need for 6-8 interns or contract resources needed to supplement meteorology, GIS, and foresters to crease prescribed fuels mitigation plans as needed.”

1) Are these 6-8 intern positions paid? Please confirm, deny, and explain.

2) If the response to 1) above is affirmative, please include these positions and all pertinent column values with the response to BCP 7-5.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

1) As BCP notes, the Labor Resources Plan for Approved Programs (Section 2.1 of the First Amendment) states in part, “[T]he adjusted incremental resource plan accommodates the anticipated need for 6-8 interns or contract resources”. If the Companies were to utilize interns, they would be paid positions. However, the Companies currently anticipate the utilization of contract resources.

2) This subsection is not applicable based on the response to subsection 1).

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-18-2025
REQUEST NO:	BCP 7-05	KEYWORD:	BCP 3-01 Amendment
REQUESTER:	BCP	RESPONDER:	Philavanh, ShazzyLynn

REQUEST:

Reference: Labor Resource Plan Details – Staff 6, BCP 3-1

Question: The attachment to the response to BCP 3-1 is not complete:

1) Subsection 2) requests the inclusion of 2024 compensation information for existing and approved NDPP-dedicated positions. Please amend the attachment and include this information.

2) Subsection 3) requests the inclusion of a column indicating if the position was vacated or filled for each year. Please amend the attachment and include this information for existing and approved NDPP-dedicated positions.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

See attached 24-12016 BCP 7-05 Attach 01.

For clarification, BCP 3-1 references Staff 6. The data provided in Staff 6 is in relation to the forecasted amounts that the Companies included in the First Amendment. This data may differ from total compensation because compensation includes other cost components. Therefore, the 2024 data provided in the attached file for the existing NDPP labor resources for approved NDPP programs include 2024 actuals charged to approved NDPP programs. However, for the Construction Manager Lead, the 2024 actuals for this employee is charged to capital surcharge which is charged to capital projects as an overhead expense.

Adjusted Labor Resource Plan for Proposed NDPP Programs	Count
Hazard Awareness	
Hazard Awareness Specialist	5
Dispersions	
Dispersions Assistant	1
Manager, Distribution Automation	1
Engineer II - 1	1
Lanes - 1	1
Lanes - 2	1
Lanes - 3	1
Lanes - 4	1
RSCADA - 1 (Relay Tech)	1
RSCADA - 1 (Relay Tech)	1
Relay Coordinator	1
Relay Coordinator	1
Total New Internal Personnel for Proposed NDPP Programs	15

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-13-2025
REQUEST NO:	BCP 6-04	KEYWORD:	Staff 08 Attachment 01
REQUESTER:	BCP	RESPONDER:	Philavanh, ShazzyLynn

REQUEST:

Reference: Tables 5, 6, 7 - Incremental Labor, Staff 8

Question: The response to Staff 8, Attachment 1, shows columns for "2025 Forecast Incremental Labor Resource Plan" and "2026 Forecast Incremental Labor Resource Plan" which total in sum to \$14,396,234. Please confirm or deny that this is the dollar amount SPPC and NPC are requesting for incremental labor for the 46 positions in this plan amendment for 2025 and 2026 (please note, the column for 2024 includes all zeros). If deny, please explain.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

The \$14,396,234 in Staff 8 represents the incremental labor costs shown in tables 5, 6 and 7 of the First Amendment and does not include all 46 positions (31 internal FTE - currently approved programs and 15 internal FTE - proposed programs).

See attachment "BCP 6-4 Attach 01" for the breakdown of the 46 positions and how those costs tie into Tables 5, 6, 7, 15, 11, 12, 13. The incremental labor costs in this attachment include the 46 positions (31 for the currently approved capital and OMAG programs and 15 for the proposed new capital and OMAG first amendment programs). The incremental labor costs also include 10 contractors.

Table Reference	Currently Approved NDPP Programs	# of Internal FTE Positions	2024 Forecast Incremental Labor Resource Plan	2025 Forecast Incremental Labor Resource Plan	2026 Forecast Incremental Labor Resource Plan	Total
Table 5. Nevada Power OMAG - Adjusted Labor Resources for Approved NDPP Programs	Nevada Power - OMAG Currently Approved NDPP Programs		-	915,863	1,068,104	1,983,966
Table 6. Sierra OMAG - Adjusted Labor Resources for Approved NDPP Programs	Sierra Pacific Power - OMAG Currently Approved NDPP Programs		-	3,700,673	4,318,705	8,019,379
Table 7. Sierra Capital - Adjusted Labor Resources for Approved NDPP Programs	Sierra Pacific Power - Capital Currently Approved NDPP Programs		-	1,934,551	2,458,338	4,392,890
	Subtotal - Tables 5,6 and 7		-	6,551,087	7,845,147	14,396,234
Table 15. Mt. Charleston Rebuild	Nevada Power - Capital Currently Approved NDPP Programs		-	171,110	171,110	342,220
	Subtotal - Tables 5,6,7 AND 15		-	6,722,197	8,016,257	14,738,454
	Adjusted Labor Resource Plan for Approved NDPP Programs - 31 Internal FTE*	31	-	5,411,310	6,391,519	11,802,829
	Adjusted Labor Resource Plan for Approved NDPP Programs - 10 Contractors*		-	1,305,877	1,609,919	2,915,796
	Resource Sufficiency - non-labor expenses (telecom, FR clothing, etc.)		-	5,010	14,820	19,830
	Subtotal	31	-	6,722,197	8,016,257	14,738,454

Table Reference	Proposed First Amendment Programs	# of Internal FTE Positions	2024 Forecast Incremental Labor Resource Plan	2025 Forecast Incremental Labor Resource Plan	2026 Forecast Incremental Labor Resource Plan	Total
Table 11. Proposed NDPP Hazard Awareness Desk	NV Energy - OMAG Proposed First Amendment Programs Hazard Awareness		-	724,508	1,035,012	1,759,520
Table 12. Proposed NDPP Distribution Automation OMAG Budget	NV Energy - OMAG Proposed First Amendment Programs		-	471,527	1,886,107	2,357,634
Table 13. Proposed NDPP Distribution Automation Capital Budget	NV Energy - Capital Proposed First Amendment Programs		-	157,176	628,703	785,878
	Subtotal		-	1,353,211	3,549,822	4,903,033

Proposed First Amendment Programs - 15 Internal FTE	15	-	1,353,211	3,549,822	4,903,033
Subtotal	15	-	1,353,211	3,549,822	4,903,033

Grand total	46
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NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-24-2025
REQUEST NO:	BCP 3-01	KEYWORD:	Staff 6 Amendment
REQUESTER:	BCP	RESPONDER:	Philavanh, ShazzyLynn

REQUEST:

Reference: Labor Resource Plan Details – Staff 6

Question: Pertaining to the Labor Resource Plan Details and the response provided in Staff 6, please answer the following:

- 1) The response to Staff 6, subpart 3) states (in part), "Attach 02 lists each new position proposed in this amendment, a total of 46 positions," yet the attachment supplied only lists 31 positions and not 46. Please amend this table by adding the 15 missing positions. Please state where each of these new positions can be found in the filing. If they cannot, please explicitly state so and provide corresponding job description information for the 15 new positions.
- 2) Please amend the response to Staff 6, subpart 3), Attachment 03, to include a column for 2024 data (including budget for each position).
- 3) Please amend the response to Staff 6, subpart 3), Attachment 03, to include a column for all data that indicates if the position was vacant or or filled for each year: 2024, 2025, and 2026. Please include the individual's name who filled or fills the position. Please also note that this information is not confidential as it is provided non-confidentially in the Attachments provided in response to Staff 6.
- 4) Please amend the response to Staff 6, subpart 3), Attachment 03, to include a column that rates each new position in its level of priority.
- 5) Please amend the response to Staff 6, subpart 3), Attachment 03, to include a column that indicates if each position is "NDPP Dedicated" or "Non-NDPP Dedicated."

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

1. The 15 positions are discussed under section "2.4.1 Personnel to Implement New Initiatives".
2. There is no budget for the 46 positions in 2024 because these positions were not anticipated to be hired in 2024.
3. The 46 positions were all vacant for 2024. See attachment "24-12016 BCP 3-01 - Attach 01" for the estimated quarter and year in which each position may be hired and filled.
4. See attachment "24-12016 BCP 3-01 - Attach 01".
5. See attachment "24-12016 BCP 3-01 - Attach 01".

* Positions listed above only include NDPP fully dedicated employees in approved programs

(3)	Notes	
	2025	2026
	2025 prorated due to Q2 start date; 2026 assumes full year cost	
	2025 full year cost due to Q1 start date	
	2025 prorated due to Q2 start date for 2 positions + Q4 start date for 1 position; 2026 assumes full year cost	
	2025 full year cost due to Q1 start date	
	2025 full year cost due to Q1 start date	
	2025 full year cost due to Q1 start date	
	2025 prorated due to Q2 start date; 2026 assumes full year cost	
	2025 prorated due to Q2 start date; 2026 assumes full year cost	
	2025 prorated due to Q2 start date; 2026 assumes full year cost	
	2025 prorated due to Q2 start date; 2026 assumes full year cost	
	2025 prorated due to Q2 start date; 2026 assumes full year cost	
	2025 full year cost due to Q1 start date	
	2025 full year cost due to Q1 start date	
	2025 full year cost due to Q1 start date	
	2025 full year cost due to Q1 start date	
	2025 full year cost due to Q1 start date	

[illegible]

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-10-2025
REQUEST NO:	BCP 1-02	KEYWORD:	NPC/SPPC OMAG, Sierra Capital & Underspend
REQUESTER:	BCP	RESPONDER:	Philavanh, ShazzyLynn

REQUEST:

Reference: NDPP 2024-2026 Current Forecast

Question: Regarding Exhibit B of the First Amendment for the NDPP Plan, please confirm or deny the following, and if deny please provide an explanation:

1) Table 5. Nevada Power OMAG – Adjusted Labor Resources for Approved NDPP Programs state “2024-2026 Current Forecast” and include a Grant Total of \$26,737,712. Without the current amendment to the NDPP application, is this the dollar amount Nevada Power Company d/b/a NV Energy (“NPC”) and Sierra Pacific Power Company d/b/a NV Energy (“SPPC” and collectively the “Utilities”) are currently forecasted to spend for NPC OMAG expenses (which is a (\$6,745,502) decrease from the originally approved budget)?

2) Table 6. Sierra OMAG – Adjusted Labor Resources for Approved NDPP Programs state “2024-2026 Current Forecast” and include a Grant Total of \$160,448,781. Without the current amendment to the NDPP application, is this the dollar amount the Utilities are currently forecasted to spend for SPPC OMAG expenses (which is a (\$8,029,196) decrease from the originally approved budget)?

3) Table 7. Sierra Capital – Adjusted Labor Resources for Approved NDPP Programs state “2024-2026 Current Forecast” and include a Grant Total of \$94,716,790. Without the current amendment to the NDPP application, is this the dollar amount the Utilities are currently forecasted to spend for SPPC capital expenses (which is a (\$11,405.503) decrease from the originally approved capital budget)?

4) Without any amendments, are the Utilities currently forecasted to underspend the NDPP by (\$26,180,201) according to the sums of Table 5 of (\$6,745,502), Table 6 of (\$8,209,196), and Table 7 of (\$11,405,503)?

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

Without the NDPP First Amendment requests, the projected underspend to the NDPP Triennial budget is the following: Nevada Power Company (OMAG) - (\$6,745,502), Sierra Pacific Power Company (OMAG) - (\$8,029,196), Sierra Pacific Power Company (capital) (\$11,405,503), totaling (\$26,180,201).

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-10-2025
REQUEST NO:	BCP 1-06	KEYWORD:	Direct Murray Q&A7 Commission Orders/Agendas In-House Resources
REQUESTER:	BCP	RESPONDER:	Howard, Danyale

REQUEST:

Reference: Stakeholder Meetings & Additional In-House Labor

Question: Mr. Murray states in his Prepared Direct testimony (Q&A 7), in part, as follows: "An assessment of ongoing NDPP implementation, driven by internal review and feedback from stakeholder and the Commission, has identified that the Companies need additional in-house labor resources to effectively execute on the NDPP."

Please cite to all parts of previous Commission Orders and/or Agenda meetings which state the need for additional in-house labor resources to effectively execute the NDPP.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

To clarify, Mr. Murray does not state that Commission Orders specifically state NV Energy's need for additional in-house labor resources to execute on the NDPP. Instead, his Prepared Direct testimony at Q&A 7 notes that NV Energy's "assessment of ongoing NDPP implementation, driven by internal review and feedback from stakeholder and the Commission, has identified that the Companies need additional in-house labor resources to effectively execute on the NDPP." This references the Companies' 2023 and 2024 assessment, which identified gaps in abilities to successfully execute risk reduction measures outlined in the NDPP. The assessment also considered the stability of existing procedures and whether they are a sustainable foundation to transition practices, in full or in part, to "regular business."

The Commission and stakeholder feedback in Docket No. 23-03004 indicated strong concerns around the oversight and management of some NDPP programs. The Modified Final Order in that proceeding specifically stated its concern with “a general lack of internal controls and review over [fire agency] work” and noted that “one individual is responsible for initiating and recommending approval of the contracts, as well as conducting the initial review of all related invoices and related grant tracking.” The Commission ordered an internal audit based on these findings. See paragraph 86.

In Docket No. 24-03006, the Modified Final Order again noted a need for more detailed information to support fire agency contracts (see paragraph 77). This as well as the Commission’s findings on the internal audit reinforced the need for additional oversight and management of certain parts of the NDPP.

NV Energy’s review of the of regulations adopted in Docket No. 19-06009 also support adjusting the labor plan to execute the NDPP. In relevant part, those regulations provide that an NDPP should include:

(j) A description of the actions that the electric utility will take to ensure that its system will achieve a reasonable level of safety, reliability and resiliency and to ensure that its system is prepared for a natural disaster, including, without limitation, vegetation management, patrols, inspections, testing, and hardening and modernizing its infrastructure with improved engineering, system design, standards, equipment and facilities, such as undergrounding, insulation of distribution wires, pole replacement and other measures. An electric utility shall use prudent practices commonly used in the electric utility industry for utility design, operating practices and telecommunications to prevent its infrastructure from causing a fire and to maintain resiliency during a natural disaster.

(k) An explanation that the electric utility has an adequately sized and trained workforce to execute the natural disaster protection plan and promptly restore service after a major event, taking into account employees of other utilities available to the electric utility pursuant to mutual aid agreements and employees of entities with which the electric utility has entered into contracts.

(m) A description of the processes and procedures that the electric utility will use to monitor and audit the implementation of the natural disaster protection plan and to take actions, as soon as practicable, to correct any deficiency that is identified.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-18-2025
REQUEST NO:	BCP 7-04	KEYWORD:	BCP 1-06 Companies 2023/2024 Assessment
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: Shareholder Meetings & Additional In-house Labor – BCP 1-6

Question: The response to BCP 1-6 states (in part), “This references the Companies’ 2023 and 2024 assessment, which identified gaps in abilities to successfully execute risk reduction measures outlined in the NDPP. The assessment also considered the stability of existing procedures and whether they are a sustainable foundation to transition practices, in full or in part, to regular basis.” (internal quotations omitted).

1) Please provide the assessment referenced here.

2) Please explain, in detail, what is meant by “sustainable foundation to transition practices, in full or in part, to regular business.”

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

1) The Companies' response to Staff DR 44 (24-12016 – Staff 44 – Attach 01) provides the draft Key Decision Report (KDR) supporting the adjusted NDPP labor resource plan. This is the same document as the one referenced in part as “the Companies’ 2023 and 2024 assessment” in the Companies’ response to BCP DR 1-6.

2) In explanation of the quoted phrase in sub-question 2), the KDR covers a variety of key decisions that culminate in a series of corrective actions required to successfully implement the

NDPP. This includes actions required to improve internal controls, oversight, policies and procedures, reporting, and internal staff resources to meet NDPP obligations.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-31-2025
REQUEST NO:	Staff 44	KEYWORD:	Feedback & Approval for New Positions
REQUESTER:	Olesky	RESPONDER:	Howard, Danyale (NV Energy)

REQUEST:

Reference: In-House Labor

Question: Howard Q&A 6, and Murray Q&A 7 state that based on an assessment of ongoing NDPP implementation, driven by internal review and feedback from stakeholders and the Commission, the Companies are requesting an adjusted NDPP labor resource plan that will hire in-house labor to help implement the currently approved NDPP score of work.

Please provide copies of the following:

A. All internal reviews including, but not limited to, key decision reports, memos and other supporting documentation that demonstrates NV Energy and BHE (where needed) approval for the proposed new positions,

B. Copies of stakeholder feedback that indicates that in-house labor should be hired.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

A. See Staff 24-12016 Staff 44 - Attach 01, which provides the draft Key Decision Report supporting the adjusted NDPP labor resource plan. In addition to this report, NDPP implementation was assessed in a series of internal meetings and discussions within NV Energy to determine the appropriate staffing levels. The NDPP adjusted labor resource plan represents

the output of those internal deliberations and uses the Companies' business judgement to identify staffing appropriate to meet the NDPP obligations at a cost that is consistent with that approved in the 2023-2026 plan.

B. Though stakeholders have not directly indicated that NV Energy should hire in-house labor resources for NDPP, stakeholders, including the Commission, have indicated that the Companies' had a "general lack of internal controls" in certain NDPP work (See the Commission's Modified Final Order in Docket No. 23-03004 at paragraph 86 and the Modified Final Order in Docket No. 24-03006 at paragraph 74, for example). To respond to these concerns and improve internal controls appropriately, the Companies are requesting the internal labor force that is commensurate without the NDPP workload.

Draft
Natural Disaster Protection Plan
Corrective Action Plan

Key Decision Report

Description: NDPP Corrective Action for Implementation

Owners: Danyale Howard

Date: July 25, 2024

Description of Key Decision:

This key decision report covers various key decisions that culminate into a series of corrective actions required to successfully implement the NDPP and to align NV Energy with maturity models for Berkshire Hathaway Energy and other utilities having the same or similar wildfire risk.

Decisions for this KDR are listed here.

- Formal prioritization of wildfire programs and protocols among other non-discretionary company initiatives.
 - Resource needs for oversight and management of day-to-day NDPP implementation
 - Procedure documentation and training for each incremental program to ensure repeatable outputs, training and performance accountability.
 - Global policy related to fire safety.
 - Develop a “one mission” culture companywide that supports engagements and encourages continuous improvement
 - Create a governance framework to ensure adherence to NDPP deliverables
 - Central repository for fire safety policies, criteria/procedures, recurring review and training standards.
 - Acclimate NDPP processes into core business
 - Ensure NV Energy’s on-going maturity of fire safety practices and culture align with industry maturity models for utilities having same or similar risk profile.
 - Utilize technology to identify root causes of actual fire incidents and predictive analysis to mitigate future occurrences
 - Utilize remote sensing and satellite technology to optimize vegetation management resources, including use of AI for predicting growth schedules and prioritization.
-

Recommendations:

This report makes the following recommendations:

1. Adopt this corrective action plan including the organizational, resource and technology plan
2. Recruit resources timely to meet 2025 fire season readiness
3. Utilize the forecasted NDPP budget underspend to offset the estimated cost of resources and technology.

Purpose:

- Objectives of the corrective action plan target:
 - Increase public safety for customers, communities and more broadly, Nevada
 - Ensure swift and professional-level emergency response to natural disasters
 - Minimize potential of a utility caused natural disaster
 - Minimize financial risk associated to liability claims
 - Increase regulatory confidence
 - Maximize potential for full recovery of investments
- Anticipated benefits of the corrective action plan:
 - Creates a “one mission” culture through the establishment of a core team that develops and administers global fire safety policies, procedures, and training, including compliance.
 - Identifies which NDPP processes and/or employees transition into the regular business units.
 - Determines business unit readiness to execute fire mitigation processes at a consistent level of quality with repeatable predictability.
 - Matures NV Energy’s approach to wildfire risk mitigation
 - Memorializes rationale for decision making and criteria for fire safety protocols
 - Provides adequate oversight and management of the contract and employee workforce executing NDPP elements
 - Establishes a seasonal cadence of fire safety milestones that are predictable, trainable, and measurable.
 - Establishes frontline leadership for each discipline of fire mitigation
 - Establishes leadership responsible for developing SME teams to execute according to the “one mission” message and cascades that message into mainstream business units.
 - Establishes SME teams that liaison externally to collaborate and further develop industry practices associated to wildfire risk and response to natural disasters.

Background: History of NV Energy's Electric System

NV Energy's northern service territory, Sierra Pacific Power ("SPPC"), is comprised of several mergers of multiple utility companies dating back to the gold rush of the 1850's. NV Energy's southern service territory, Nevada Power Company ("NPC") was formed in 1906. Today, NV Energy's combined service territories span approximately 45,000 miles consisting of more than 30,000-line miles of electric transmission and distribution. The line miles of the overhead and underground system are almost split equally at approximately 15,000-line miles each.

Much of NV Energy's overhead system is aged with no current formal program for replacement. Historically, electric system maintenance protocols were driven by reliability performance because until more recently, catastrophic wildfires were not a prevailing risk and did not occur at the magnitude or frequency they do today. The Company lacked formal maintenance programs except for those programs required by NERC/FERC WECC and for gas. Today, inspection for wildfire detection is an industry best practice. Most other western utilities now manage formal inspection programs for 100% of their overhead systems.

The NDPP program, by its design, creation, and adjudication through the regulatory process is limited to a small geographic footprint, and as such, hinders the consolidated integration into larger transmission and distribution operations.

The NDPP addresses 9% of the overhead system and increases to 22% with the addition of Tier 1, which was added to the NDPP 2024 with a limited scope of cyclical maintenance activities. Situational awareness is limited in Tier 1 and beyond the fire tiers. Tier 3, the highest risk fire tier, represents 1% or 321 miles of NV Energy's total overhead line miles.

Overall, the NDPP addresses approximately 4,000-line miles. Non-tier areas represent almost 11,000 overhead line miles. Significant wildfire risk exists outside the defined geographic areas of the NDPP, especially areas where aged infrastructure exists. Typically, rural areas host much of the aged equipment, some dating back to the early to mid-1900's. Typical line construction for rural areas include long overhead spans of bare wire and traditional expulsion fuses.

Figure 1 shows the 2024 NDPP asset inventory of transmission and primary distribution line miles.

Fig. 1 2024 NV Energy Electric Line Miles

2024 NDPP Asset Inventory Nevada Power and Sierra Pacific					
	Overhead System	Overhead Bare Primary Line Miles	Overhead Covered Primary Line Miles	Primary Underground Line Miles	% of Total System
Tier 3	NPC Transmission	0	0	0	0.00%
	NPC Distribution	16.00	0	3	0.06%
	SPPC Transmission	25.89	0	0	0.08%
	SPPC Distribution	165.04	5.12	105.41	0.89%
	Total	206.93	5.12	108.41	1.04%
Tier 2	NPC Transmission	0	0	0	0.00%
	NPC Distribution	0	0	0	0.00%
	SPPC Transmission	113.34	0	0	0.37%
	SPPC Distribution	317.51	2.08	295.52	1.99%
	Total	430.85	2.08	295.52	2.36%
Tier 1E	NPC Transmission	0	0	0	0.00%
	NPC Distribution	0	0	0	0.00%
	SPPC Transmission	245.06	0	11.14	0.83%
	SPPC Distribution	1084.17	2.25	338.75	4.62%
	Total	1,329.23	2.25	349.89	5.45%
Tier 1	NPC Transmission	188.00	0	0	0.61%
	NPC Distribution	90.00	0	1339.00	4.63%
	SPPC Transmission	839.22	0	2.55	2.73%
	SPPC Distribution	1101.84	0.12	560.38	5.39%
	Total	2,219.06	0.12	1,901.93	13.36%
Non-Tier	NPC Transmission	2019.69	0	14.66	6.60%
	NPC Distribution	1619.46	0	11275.41	41.82%
	SPPC Transmission	3201.77	0	11.94	10.42%
	SPPC Distribution	3977.78	0	1863.29	18.94%
	Total	10,818.70	0.00	13,165.30	77.78%
System Total	NPC Transmission	2208.10	0	14.66	7.21%
	NPC Distribution	1725.18	0	12617.41	46.51%
	SPPC Transmission	4425.28	0	25.63	14.43%
	SPPC Distribution	6646.34	9.57	3163.34	31.84%
	Total	15,004.90	9.57	15,821.04	100.00%

Background: History of the NDPP

The NDPP was initiated during 2019 in response to the catastrophic fires occurring in neighboring states. Associated with the inaugural NDPP were some 26 programs of varying size and complexity that in total require significant people and equipment resources to stand-up, execute and maintain the program effectively.

While much effort was put forth on identifying the financial resources required for these programs and incorporating them into NV Energy's 10-year plan, relatively little effort has been put forth on identifying the people and other resources required for these programs or the impact they have on regular business.

The funding estimate of the original 2020-2023 plan budget was decreased by almost \$100 million by the time it received final approval. Although the budget was decreased, the program scope remained relatively unchanged. Additionally, the cashflow that was laid out in the plan did not reflect a typical workstream for the planned work much less accommodate the arduous task of standing-up and acclimating new industry practices into a historically reliability based cultural mindset.

The NDPP was initiated with a very small team comprised mostly of displaced employees having little to no direct experience with the work recommended in the plan. Most of the NDPP programs represent a significant and additional workload that was not in NV Energy's plans prior to creation of the NDPP. The execution of the plan was assumed to be delivered by the regular business units. However, at the same time, commencing in 2020 the Companies endeavored to constrain backfilling of vacant positions. The Companies have added some employees since that time and have also initiated several large initiatives including NDPP. Considering historical resource and performance levels, it can be assumed that any one the major new initiatives would challenge the existing workforce. NDPP work adds an additional layer to complexity because the work itself is new to the industry and incremental to the Companies regular business, meaning that in most areas, there is little to no institutional knowledge. Additionally, initiatives continue to compete with current economic growth resulting in new connections occurring across Nevada. All things considered, the head count within Electric Delivery, where NDPP resides, had been relatively flat from 2019 to 2024, resulting in business units, including NDPP, to prioritize positions and work largely within existing headcounts.

The NDPP was initiated during the COVID-19 pandemic of 2020. A large-scale campaign was launched to execute on maintenance activities such as vegetation management and circuit patrols, inspections and corrections in the highest fire risk areas and on the worst performing circuits for

Nevada Power. Maintenance activities are typically considered short-cycle work that don't require the extensive pre-requisites that the larger scale more permanent mitigation programs require. During 2020 and beyond, contract resources continued to ramp up because they are easily obtained. A significant amount of work was accomplished through electric Lines and tree trimming contracts and agreements made with local fire agencies.

The initiatives requiring more specialized resources such as standards engineering, design, system control operators and lines resources for system hardening for example, were largely left unaddressed because the plan lacked a logistical element to address organization and creation of processes, including business unit support through written policy and training to both prioritize and acclimate the incremental work into core company business. For this reason and combined with the COVID-19 pandemic, the small NDPP team struggled to successfully execute on the significant pre-requisites required to stand-up more complex projects and programs.

During 2022 and 2023, a new trend of catastrophic wildfires occurred across northern America and beyond. These mega-fires occurred in areas not previously identified as high risk (e.g. Canada, Hawaii, Texas and Colorado), reinforcing that identification and prioritization of wildfire risk is still somewhat elusive. For NV Energy, wildfires continued to occur in the non-fire tier areas. In response, the Companies placed significant focus on situational awareness and emergency response efforts. New resources and technology were approved for meteorology, fire mitigation, data science and advanced technology.

Since the inception of the NDPP, the Companies have actively participated with other utilities to keep apprised of the quickly evolving fire mitigation efforts that have changed in their weighting of prioritization and synchronicity to each other. This evolution of combining sort cycle maintenance, longer term ruggedization and operational protocols continues to improve the utilities perspective of wildfire mitigation.

As execution of the plan continues and learnings are gained, the contract workforce has outpaced the number of internal resources skilled or available to manage them from a field and/or administrative perspective. Additionally, technology has advanced significantly to address the various intricacies of the incremental work. Outside of situational awareness, the Companies have not accessed these technologies that are designed to gain efficiency and effectiveness from both a mitigation effectiveness and cost efficiency standpoint.

This KDR represents an assessment of plan implementation to identify gaps and make recommendation for improvements needed for both baseline implementation as well as logistical elements needed to create the cultural and functional changes necessary to adopt fire mitigation processes into core business.

Problem Statement

NV Energy operates a critical electrical power grid infrastructure, and ensuring its resilience and safety is paramount, especially in regions prone to wildfire. The inaugural NDPP was developed quickly to meet an urgent need to proactively address Nevada's risk of wildfire and other natural disasters. Some challenges associated with the implementation of the NDPP were seen throughout most programs. This KDR addresses the most significant challenges that are not perceived to be purely developmental in nature.

Additionally, regulatory scrutiny and feedback from stakeholders prompts a closer look at NDPP programs, specifically noting areas of concern such as processes associated to fire agency contracts. For those issues, the Companies are establishing improved processes, noting gaps where personnel resources and/or technology resolves issues and creates efficiencies.

Corrective Action by Initiative:

The following are key take-aways from assessment of NDPP initiatives and the recommendations for resolution to priority issues noted.

Governance, Policy, Procedure, Training and Reporting

1. *Issue* - Overall, the Companies are lacking in policy and global prioritization of fire safety as a non-discretionary activity. Global policy, procedure documentation and training are needed for consistent application by the NDPP team to develop as subject matter experts. Refinement and finalization of procedures is needed to acclimate processes into general business. Recurring review is needed to ensure repeatable and measurable outputs. Policies require annual review, update and distribution and training to keep pace with industry practices that are evolving quickly.

Recommendation - Contract two full-time technical writers to work with (proposed) front line leaders for each NDPP discipline to formalize internal documentation in a standard format for distribution, training and reference for the general business. As part of policy and procedure development, consideration will be made to identify applicable equipment, resources, and training. Where identified, job aids and/or training is needed.

2. *Issue* - No central location or single document exists that includes NDPP required practices, deliverables or processes. The NDPP has been developed primarily for external filing purposes and practices are largely verbal or live in disparate documents. General business units are unable to easily access detailed information applicable to specific initiatives, principles and rationale, required actions, training, and/or quality assurance measures.

Recommendation - The Companies are evaluating the use of AssurX to house the proposed inventory of policy and process documentation and will consider developing a single internal document that contains references to the most current internal and external sources for continued NDPP implementation and/or continued practices for reference in core general business. AssureX capability categorizes policies, including links to applicable trainings and literature related to a given policy. Further, AssureX provides a calendar feature to set required annual review of policies, tracks version updates and required training.

3. *Issue* – the Companies lack standardized reporting for NDPP initiatives and/or an ability to efficiently compile. Generating NDPP reports is critically inefficient. Most of the progress for NDPP initiatives by unit measure and Plan performance is tracked in disparate excel workbooks by individual project managers and contractors. A critical need exists to mine data, create standardized scripts and scheduled reports for various internal and external stakeholders at all levels.

Recommendation - The Companies will create a front-line Compliance leader for managing project documentation, and the development and delivery of standardized internal and external reports. The Companies should consider adding back, a Sr. Operations Analyst for mining data, report creation and to provide support to project management and overall Plan implantation related to data needs. The inaugural NDPP team included a Sr. Operations Analyst that self-terminated during 2022. Head count constraints caused the Sr. Operations Analyst position to be re-classified to a Sr. Construction Management Lead to meet an immediate and urgent need for system hardening field execution. The Companies attempted to absorb the Sr. Operations Analyst function in Electric Delivery to no avail. After a constant transition of employees and de-prioritization of NDPP needs, the NDPP enlisted a third-party contractor to perform this function, but efforts were limited at best, due to the lack of knowledge and experience third-party contractors have for company-specific organization and process flows.

Vegetation Management

Hazardous Ground Fuels Management –

Issue – New processes for hazardous ground fuels identifies gaps in field and administrative oversight needed to plan, manage, assign and validate ground fuels work as well as perform invoice review of charges. Total vegetation management activity has increased by 10x since 2019, with administrative and field oversight only growing less than 2x

The vegetation management, ground fuels program received significant regulatory scrutiny over the past two years and was the subject of the Commissions directive to perform an internal audit of transactions associated to the program.

Quality assurance issues were identified in completed field work and invoice review, payments and contract processing.

Part time contractors are used to supplement resource limitations. In some cases, part time contractors work beyond contractual insurance and indemnification limits to use company heavy machinery and equipment.

Long standing resource constraints challenge the vegetation management tree trimming program. Narrow focus on performing ariel clearing of the ROW in the high fire risk areas has now left populated non-tier areas lagging.

Recommendation –Ground fuels management would benefit from coordinating or merging with arial tree trimming to gain synergies, and allocated fire mitigation resources, who currently perform this function to a different critical need which is fire post- and predictive analysis and the development and facilitation of field operations training related to performing work during high fire risk times and pursuant to WUI and other code and jurisdictional requirements.

Issue – the companies lack the use of technology to evaluate and prioritize vegetation management and ground fuel mitigation work. Today, the Companies processes are extremely manual in nature, requiring truck rolls for patrol and schedule planning.

Recommendation – the Companies would benefit from evaluation of technology specifically designed for vegetation management, including predictive growth cycles, and ability to take pictures remotely. The Companies evaluated the use of AiDash for a pilot project to better understand the technology for use in a future RFP for competitive bid for services.

ack of funding to maintain vegetation management standards both within the HRAs and larger service territories may result in increased risks of disruption in areas outside the HRAs. Inability

to scale the vegetation management workforce for seasonal needs may result in failure to achieve desired or planned vegetation management outcomes.

The Companies will evaluate resources needed to execute vegetation management activities, including field and administrative oversight required to ensure field execution, invoice processing and quality assurance inspections are met. Resources requirements will be evaluated through a Key Decision Report.

Management at NV Energy should consider leveraging the FieldNote application to track QA audits of completed work orders.

Fire Incident Analysis

Issue - A formal process for analysis to identify root causes and trends could support NDPP program-level decision-making, prioritization, and planning. The Companies currently track fires using an excel database and are unable to use actual events to predict future occurrence or analyze root causes for trends.

Recommendation – the Companies collaborated with AltaLink to develop processes for analysis of fire events in accordance with predefined criteria and review to track root causes, establish fire classifications and ensure different levels of analysis. AltaLink and NV Energy collaborated with PacifiCorp to leverage PacifiCorp’s work with Palantir Foundry to track, analyze and report actual fire events. Further, Palantir Foundry satisfies an additional gap identified in customer communication for the purpose of PSOM and de-energization.

System Hardening

Design, Engineering and Construction

Lack of standards engineering support early in the program resulted in incomplete design and construction standards for use with covered conductor installation. A recent failure in installed covered conductor resulted in a complete suspension of the covered conductor program pending a full investigation. Issues were determined to be largely attributable to installation methods and at least one reel of wire was found to have material irregularities.

Covered conductor standards, training and tooling selection that was determined to be a major contributor of the issues, was evaluated and enhanced. Ten miles of covered conductor was installed prior to the improvement of standards and training.

Design

During 2020, five of the eleven internal design resources were approved to perform NDPP design for system hardening. Dedicated resources remained within the regular business unit and by 2021 were re-assigned from NDPP to new business, leaving NDPP without design resources, jeopardizing capital system hardening milestones.

NDPP attempted to on-board and train entry level contractors but was unsuccessful not having a dedicated resource to perform training/mentoring. By 2023, NDPP converted an Operations Analyst position (responsible for NDPP reporting) to a Sr. UDA. The single UDA has onboarded and trained two external contractors to create \$48m worth of system hardening design. As a comparator of workload, the entire Northern Nevada Distribution Design department performs, on average \$35m worth of new business design supported by more than 50 full time resources and external contractors. NDPP will need to produce more than \$100m in capital system hardening design to meet current Plan targets.

Construction

Internal t-man and/or inspector oversee third-party contractors performing Lines construction for system hardening and corrections. NDPP typically employs approximately 19 crews to perform system hardening work across Nevada. As a comparator, these are more crew resources than all of Northern Nevada electric internal lines operations combined. Electric lines struggle to maintain

adequate resources required to perform planned outages, switching and field oversight of third-party NDPP lines crews. This resource issues are responsible, in part, for the oversight issue discovered with covered conductor installations that failed.

Grid Operations and Fire Season Protocols

1. *Issue* - NV Energy does not have formalized operating procedures governing periods of elevated fire risk or that relate to forecasted weather conditions.

Recommendation - NV Energy Management is currently in the process of developing formal procedures and once completed will be shared with control center operators. This will be in the form of procedure 4910 which is undergoing revision in 2023.

2. *Issue* - Operators at NV Energy do not use real-time weather data in their decision-making process.

Operators use the daily fire hazard report as real-time data as well as supplementary publicly available data. However, the current SOPs do not describe how weather station or camera data are used.

Recommendation - Access to the real-time data has been provided to the operations team and will be incorporated into SOPs.

3. *Issue* - NV Energy lacks a formal method of communicating situational awareness to control center operators. The information is communicated through informal channels and only when certain red flag warnings are in place. At least one person interviewed indicated that emails via distribution list would be a significant improvement.

Recommendation – This communication improvement is in progress.

4. *Issue* – the Companies evaluated its fire season training program to include an automated component in LMS for basic/refresher trainings and dedicate additional resources to provide enhanced trainings on fire safety and situational awareness in the field.

Recommendation – This improvement is in progress. New FMOs have reviewed all written testimony, code and ordinances, including WUI, to identify requirements for field operations conducted during high fire risk days.

5. *Issue* – The Companies lack resources to review, coordinate and execute on planned outages for NDPP. This has resulted in missed outages, even after customers have been notified. Work associated to rescheduled outages has resulted in change orders and remobilization of contractors to different job sites.

Recommendation – Additional resources are needed in system control to manage NDPP work and ensure planned work can commence as scheduled.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-10-2025
REQUEST NO:	BCP 1-05	KEYWORD:	Exhibit B, Table 3 Updated Columns
REQUESTER:	BCP	RESPONDER:	Howard, Danyale (NV Energy)

REQUEST:

Reference: Estimated Contract Workforce

Question: Regarding Exhibit B First Amendment for the NDPP Plan, Table 3, 2023 and 2024 Estimated Contract Work Force, please provide this same table, in executable format, and list each actual contractor by name that was utilized in 2023 and 2024 for each category on listed on the table. Please include a column with the same information for actual 2025 contractors by name (include estimated contractors where necessary but specify that they are estimated or anticipated). Please include the same information in a separate column for 2026 estimated contractors (by name). Please total each column by year. If the Utilities would like to include the "estimated contract work force" figures as well, please do so in separate columns so that actual entities contracted by the Utilities can be differentiated from "estimated contract work force."

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

The Companies worked with each contract supplier to capture the actual count of individuals that make up the contract workforce dedicated to NDPP. 24-12016 -BCP 1-05 Attach 01 presents the results from each supplier.

NDPP Contract Workforce	Supplier Name	2023 Actual (Estimated)	2024 Actual (Estimated)	2025 Anticipated	2026 Anticipated	Estimated Contractors
NDPP Core Team Support						18
Contract Administrator	Lancaster Technical	1	1	1	1	
Customer contact/complaints and outbound scheduling	Lancaster Technical	1	1	1	1	
Grant manager	Lancaster Technical	1	1	1	1	
Lines Construction						70
NDPP Expulsion Fuses	Sturgeon	0	12	12	12	
NDPP Line Work (Poles/Rebuilds)	Wasatch Electric	69	92	110	120	
NDPP Line Work (Poles/Rebuilds)	Mountain Engineering	31	39	45	55	
AP3402 DCI FU-REPL P1 POLE - (Angel Peak)	EC Sources (T&D)	36	44	44	52	
FIRE MITIGATION GOODSPRINGS 12- (Good Springs)	Sturgeon	36	44	44	52	
SM1201 CIRCUIT PATROL - REPAIR (Spring Moutain)	Blue Sky Helicopter	0	7	13	7	
Circuit Resiliency (Single Pole Change-Outs)	SWCA Incorporated	0	6	6	6	
	VM West	0	30	30	30	
	Dielco Crane (South)	15	15	15	15	
	Walk This Way	5	5	5	5	
	RoadSafe	5	5	5	5	
	Nevada Barricade	5	5	5	5	
Civil Construction - Undergrounding (NDP Group Managed)	Curtis & Sons	6	9	20	27	
Fire Prevention Specialists ("FPS")						5
Stand by, project oversight and documentation		5	5	5	5	
Environmental Services						10
NPC and SPPC environmental services	Ascent Environmental Inc	10	10	10	10	
Vegetation Management*						152
	Asplundh Tree Expert Co., LLC	71	71	71	71	
	Eocene Group of the West	12	12	13	13	
	RK Contractors, Inc.	10	10	10	10	
	Associated Crane, LLC (North)	2	2	2	2	
	Dielco Crane (South)	2	2	2	2	
	RoadSafe & Nevada Barricade Traffic Systems (North)	3	3	3	3	
	Nevada Barricade/ Walk this Way (South)	3	3	3	3	
	El Aero Services, Inc.	2	2	2	2	
	Lancaster Technical	2	2	4	4	
Fire Agency Hazardous Ground Fuels Management and Stand-By (for projects, maintenance and PSOM)*						120
	Truckee Meadows FPD	40	40	40	40	
	North Lake Tahoe FPD	22	49	53	53	
	Tahoe Douglas FPD	28	28	28	28	
	Central Lyon County	14	9	9	9	
	Lincoln County Fire	10	5	7	7	
	Elko County	24	12	18	18	
	Mt Charleston Fire	6	3	6	6	
	North Lyon County	0	0	0	0	
	Storey County	7	9	11	11	
	Carson City	0	0	0	0	
	East Fork Fire	0	0	0	0	
Third-Party Ground Fuels, Helicopter and Logging						65
	Nevada Dept. of Forestry	131	52	49	49	
	VM West (+ sub-contractors)	40	56	56	56	
Weekly Fuel Sampling						5
	Desert Research Institute via Metasys	2	2	2	2	
System Hardening Distribution Design						3
Internal Design Staff Augmentation	Actalent Sersvices	2	4	4	4	
External Engineering/Design Contract Firms	Actalent Sersvices		12	24	24	
	Ascension Power Engineering	3	4	4	4	
	KCI Technologies	4	5	13	13	
	TRC Solutions	5	6	12	12	
	Power Engineering		6			
	Diversified	2	5	9	9	
Civil Design						3
	Lumos Civil Engineering	3	4	6	6	
	CFA Civil Engineering					
Project Management and Construction Management						4
PM/CM System Hardening Staff Augmentation	Actalent Services	1	4	4	4	
Radio Technician						1
	Metasys	1	1	1	1	
LIDAR Acquisition and Processing						2
	Ulteig	21	21			
	Actalent	0	23	23	0	
*Vegetation Management crew sizes vary from 5- to 10-persons depending on work type. This comparison uses a conservative number of crews assigned at an average crew size of 8-persons.		638	786	852	875	458

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-13-2025
REQUEST NO:	BCP 6-01	KEYWORD:	NDPP Financial Team List
REQUESTER:	BCP	RESPONDER:	Philavanh, ShazzyLynn

REQUEST:

Reference: NDPP Labor – Financial Team

Question: In Docket No. 24-03006, Q&A 14 in Shazzy-Lynn Philavanh's direct testimony states (in part), "NDPP financial team conducted a thorough review of the 2022 and 2023 fire agency invoices." Additionally, per the response to BCP 1-01, the Utilities stated that they completed the internal audit on all NDPP fire agency transactions since inception which was provided to the Commission.

Please provide an executable list (similar to the one provided in response to BCP 2-1 in this current Docket) of all individuals on the "NDPP Financial Team" who were apart of this review process. Please include their name, position title, hire status, start date, backfill date, included in SPPC or NPC GRC (yes/no), and 2024 gross compensation.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

See attached, "24-12016 - BCP 6-7 - Attach 01".

The labor costs for the internal Companies' financial team that participated in the review are all part of the Nevada Power and/or Sierra Pacific Power GRC. These employees are not NDPP fully dedicated employees. For employees who were on-call as part of the IMT (incident management team), their 2024 on-call pay is provided as it pertains to supporting NDPP.

The Companies also utilized six external employees to assist with the review. These labor costs were not and will be not part of the NDPP regulatory asset filing.

On Call Pay		(4)
Name	Title	ON Call Pay
Davis, Gary Alen	Business Anlist Lead - Finance	4,500.00
Philavanh, ShazzyLynn	T&D Fin Bus Support Dir	6,000.00
Grand Total		10,500.00

Finance Team supporting NDPP				
Name	Position	Hire Status	Start Date	Included in SPPC's or NPC GRC
Philavanh, ShazzyLynn	T&D Fin Bus Support Dir	Existing	5/21/2012	Yes
Davis, Gary Alen	Business Anlist Lead - Finance	Existing	5/19/2014	Yes
Dana, Victoria	Sr Fin Plng Analyst	Existing	10/23/2023	Yes
Todd, Matt	Sr Fin Plng Analyst	Existing	10/23/2023	Yes

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-11	KEYWORD:	Labor Cost Allocation
REQUESTER:	BCP	RESPONDER:	Philavanh, ShazzyLynn

REQUEST:

Reference: Labor – Staff 6, BCP 3-1

Question: 1) For the 10 requested NDPP-dedicated existing personnel that appear in the attachment to BCP 3-1, please indicate for each position if that position is currently paid through NPC, SPPC, or NV Energy, Inc.

2) For the 10 requested NDPP-dedicated existing personnel that appear in the attachment to BCP 3-1, please indicate if that position existed prior to the NDPP's implementation in 2019.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

See attached 24-12016 BCP 8-11 - Attach 01.

Column J notes the service territory the costs are forecasted to be incurred in.

Column K notes if the position existed prior to 2019. One position existed prior to 2019 and was transferred to the NDPP department. As shown in Staff 25 - Attach 02 in Docket No. 22-03006, the Sr. Project Manager's prior position was backfilled by a new, external hire. In the final order for Docket No. 22-03006, the position was considered incremental and approved for recovery.

Existing Labor Resource Plan for Approved NDPP Programs *			Existing Prior to 2019		
2024 Actuals	2025	2026	Total	Company	
203,858	458,376	472,127	1,134,361	1 Position NPC & SPCC / 1 Position SPCC	1 position - yes, 1 position - no
281,010	424,583	437,320	1,142,913	2 Positions SPCC	No
201,267	294,467	303,301	799,036	NPC & SPCC	No
118,268	237,364	244,485	600,118	NPC & SPCC	No
213,073	260,800	268,624	742,497	NPC & SPCC	No
201,962	235,640	253,509	720,952	NPC & SPCC	No
128,718	182,600	188,078	499,397	NPC & SPCC	No
55,431	114,949	118,398	288,778	NPC & SPCC	No
1,403,607	2,228,780	2,295,644	5,928,031		

* Positions listed above only include NDPP fully dedicated employees in approved programs

Adjusted Labor Resource Plan for Approved NDPP Programs			Total		
2024	2025	2026	Total	Notes	Priority Rating (1 = highest)
-	68,404	91,205	159,609	2025 prorated due to Q2 start date; 2026 assumes full year cost	1
-	181,876	181,876	363,751	2025 full year cost due to Q1 start date	1
-	411,652	548,549	960,201	2025 prorated due to Q2 start date for 2 positions + Q4 start date for 1 position	1
-	118,864	237,728	356,592	2025 full year cost due to Q1 start date	1
-	185,431	185,431	370,863	2025 full year cost due to Q1 start date	1
-	181,830	181,830	363,660	2025 full year cost due to Q1 start date	1
-	946,235	1,261,647	2,207,883	2025 prorated due to Q2 start date; 2026 assumes full year cost	1
-	378,494	504,659	883,153	2025 prorated due to Q2 start date; 2026 assumes full year cost	1
-	135,687	207,582	363,269	2025 prorated due to Q2 start date; 2026 assumes full year cost	1
-	665,310	887,081	1,552,391	2025 prorated due to Q2 start date; 2026 assumes full year cost	1
-	146,872	195,830	342,702	2025 prorated due to Q2 start date; 2026 assumes full year cost	1
-	188,933	225,244	394,177	2025 prorated due to Q2 start date; 2026 assumes full year cost	1
-	987,219	987,219	1,974,438	2025 full year cost due to Q1 start date	1
-	182,310	182,310	364,620	2025 full year cost due to Q1 start date	1
-	240,675	240,675	481,351	2025 full year cost due to Q1 start date	1
-	209,207	209,207	418,414	2025 full year cost due to Q1 start date	1
-	182,310	182,310	364,620	2025 full year cost due to Q1 start date	1
-	5,411,310	6,391,519	11,802,829		

Adjusted Labor Resource Plan for Proposed NDPP Programs			Total		
2024	2025	2026	Total	Notes	Priority Rating
-	724,508	1,035,012	1,759,520	2025 prorated due to Q1 start date for 2 positions + Q3 start date for 3 positions	2
-	68,782	275,127	343,909	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	45,312	181,250	226,562	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	74,084	296,337	370,421	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	74,084	296,337	370,421	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	74,084	296,337	370,421	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	58,561	234,244	292,805	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	58,561	234,244	292,805	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	45,312	181,250	226,562	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	55,837	223,348	279,184	2025 prorated due to Q4 start date; 2026 assumes full year cost	2
-	1,353,211	3,549,822	4,903,033		

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-01	KEYWORD:	Details of the Senior Operations Analyst
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: Senior Operations Analyst, Compliance Reporting

Question: 1 Senior Operations Analyst, Compliance Reporting

The Utilities are requesting 1 Senior Operations Analyst for Compliance Reporting. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows: Senior Operations Analyst – will coordinate with the compliance manager and contracted content writer(s) to develop standardized reports for the NDPP team, provide internal reporting within NV Energy, and support reporting requirements to the Commission and other regulatory entities.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc. (collectively, the “Utility” or Utilities”).

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Operations Analysts, Compliance Reporting, and Internal Reporting employees SPPC currently employs (at the date of this response). Within this response, please list the employees’ title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

1) This position will be held and paid through SPPC.

2) This position will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) The requested Senior Operations Analyst for Compliance Reporting position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at SPPC.
- 5) The requested Senior Operations Analyst for Compliance Reporting position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NPC.
- 6) The requested Senior Operations Analyst for Compliance Reporting position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) As stated in Ms. Howard's prepared direct testimony Q&A 14, pertaining to this position, the work has been performed on an ad hoc basis. Primary responsibility for this work has resided with the director(s) of Natural Disaster Protection. Listed in the attachment to the Companies' response to BCP DR 4-1 (24-12016 – BCP 4-1 - Attach 01.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.
- 10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for this position at this point in time.
- 11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

DOCKET 24-12016: ATTACHMENT TO RESPONSE TO BCP DR 4-1

Job Title	# of Current Employees	Company	Recovery Method
Director - Natural Disaster Protection	0	SPPC	GRC
Director - Natural Disaster Protection - Compliance and Operations Support	0	SPPC	GRC
Director - Natural Disaster Protection - Program Execution	1	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-02	KEYWORD:	Senior Utility Design Coordinator, Distribution Design NPC
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: Details of the Senior Utility Design Coordinator

Question: 1 Senior Utility Design Coordinator, Distribution Design NPC

The Utilities are requesting 1 Senior Utility Design Coordinator for Distribution Design for NPC. Please answer the following:

1) The detailed descriptions of the positions listed in Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, does not provide a corresponding description of what this position will do. Please provide an elaborate description of the job functions of this position like those provided for the other requested positions.

2) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc.

3) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

4) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

5) Please list in a table all Utility Design Coordinators and Senior Utility Design Coordinators employees SPPC currently employs (at the date of this response). Please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

6) Please provide the same information requested in 4) above for NPC.

7) Please provide the same information requested in 4) above for NV Energy, Inc.

8) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please include and list in a table the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

9) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

10) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

11) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

12) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

1) The detailed descriptions of the positions listed in Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, provides a corresponding description for the combination of the Utility Design Administrator and Utility Design Coordinator positions. It states: "Utility Design Administrator ("UDA")/Utility Design Coordinator ("UDC") – UDAs are specific to Sierra Pacific and perform all capital fire mitigation and grid resilience system design estimation and

coordination cradle to grave, while overseeing additional third-party contractors needed to meet an adequate level of design to meet NDPP system hardening milestones. The utility design coordinator is specific to Nevada Power to perform coordination of design activities but does perform the design function.”

2) This position will be held and paid through NPC.

3) This position will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

4) This question is not applicable based on the response to sub-question #3 above.

5) The requested Senior Utility Design Coordinator for Distribution Design position is one that exists at NPC only. There are no employees currently in this position at SPPC.

6) Listed in the attachment to the Companies' response to BCP DR 4-2 (24-12016 – BCP 4-2 - Attach 01.xlsx) are the Utility Design Coordinators and Senior Utility Design Coordinators NPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, and the recovery method (GRC or NDPP with carry).

7) The requested Senior Utility Design Coordinator for Distribution Design position is one that exists at NPC only. There are no employees currently in this position at NV Energy, Inc.

8) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

9) As stated in Ms. Howard's prepared direct testimony Q&A 15, pertaining to this position, NDPP design work at NPC has been performed by a single contract designer. Coordination of this work has primarily been performed by the Senior Project Manager - Delivery - Natural Disaster Protection at NPC. Listed in the attachment to the Companies' response to BCP DR 4-2 (24-12016 – BCP 4-2 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

10) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

11) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for this position at this point in time.

12) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 4-2

Job Title	# of Current Employees	Recovery Method
Utility Coordinator I - Distribution Design Services	22	GRC
Utility Coordinator II - Distribution Design Services	4	GRC

DOCKET 24-12016: ATTACHMENT 02 TO RESPONSE TO BCP DR 4-2

Job Title	# of Current Employees	Company	Recovery Method
Senior Project Manager - Delivery - Natural Disaster Protection	1	NPC	NDPP withy carry

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-03	KEYWORD:	Details of the Senior Utility Design Administrators
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: Senior Utility Design Administrators, Distribution Design SPPC

Question: 3 Senior Utility Design Administrators, Distribution Design SPPC

The Utilities are requesting 3 Senior Utility Design Administrators for Distribution Design for SPPC. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows: Utility Design Administrator (“UDA”)/Utility Design Coordinator (“UDC”) – UDAs are specific to Sierra Pacific and perform all capital fire mitigation and grid resilience system design estimation and coordination cradle to grave, while overseeing additional third-party contractors needed to meet an adequate level of design to meet NDPP system hardening milestones. The utility design coordinator is specific to Nevada Power to perform coordination of design activities but does perform the design function. Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

1) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

2) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

3) Please list in a table all Utility Design Administrators, Senior Utility Design Administrators, and Grid Resilience System Design employees SPPC currently employs (at the date of this response). Please list the employees’ title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

4) Please provide the same information requested in 4) above for NPC.

5) Please provide the same information requested in 4) above for NV Energy, Inc.

6) Pertaining to these three requested positions, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

7) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

8) Please explain how and why these requested positions are not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

9) Please explain why these positions were not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

10) Please explain how these positions are incremental to the normal course of business of the electric utilities.

11) The description above states that these three requested positions will "oversee[] additional third-party contractors." Who at SPPC, NPC, or NV Energy, Inc. currently oversees third-party contractors? Please provide a comprehensive list in table format of all individuals who oversee third-party contractors, including their titles, and indicate which entity the position resides or is paid from (SPPC, NPC, or NV Energy, Inc.). For each response indicate if recovery for that position is requested in a GRC (though the BTGR) or in the NDPP.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Three (Zipped)

RESPONSE:

These positions will be held and paid through SPPC.

1) These positions will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by external candidates. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with these positions through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

2) This question is not applicable based on the response to sub-question #1 above.

3) Listed in the attachment to the Companies' response to BCP DR 4-3 (24-12016 – BCP 4-3 - Attach 01.xlsx) are the Utility Design Administrators (three levels) SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, and the recovery method (GRC or NDPP with carry).

4) The requested Senior Utility Design Administrators for Distribution Design position is one that exists at SPPC only. There are no employees currently in this position at NPC.

5) The requested Senior Utility Design Administrators for Distribution Design position is one that exists at SPPC only. There are no employees currently in this position at NV Energy, Inc.

6) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

7) As stated in Ms. Howard's prepared direct testimony Q&A 15, pertaining to this position, the work has been performed by one NDPP UDA with contractor support. Listed in the attachment to the Companies' response to BCP DR 4-3 (24-12016 – BCP 4-3 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

8) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

9) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

10) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by external candidates.

11) The reference in the description above is to third-party distribution design contractors performing NDPP work. Listed in the attachment to the Companies' response to BCP DR 4-3 (24-12016 – BCP 4-3 - Attach 03.xlsx) are the job titles of the employees who oversee these

contractors, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 4-3

Job Title	# of Current Employees	Recovery Method
Assoc Utility Design Administrator - Distribution Design Services	8	GRC
Utility Design Administrator - Distribution Design Services	17	GRC
Senior Utility Design Administrator - Distribution Design Services	7	GRC

DOCKET 24-12016: ATTACHMENT 02 TO RESPONSE TO BCP DR 4-3

Job Title	# of Current Employees	Company	Recovery Method
Senior Utility Design Administrator - Natural Disaster Protection	1	SPPC	GRC

DOCKET 24-12016: ATTACHMENT 03 TO RESPONSE TO BCP DR 4-3

Job Title	# of Current Employees	Company	Recovery Method
Senior Utility Design Administrator - Natural Disaster Protection	1	SPPC	GRC
Senior Project Manager - Delivery - Natural Disaster Protection	1	NPC	NDPP withy carry

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-04	KEYWORD:	Details of the Senior Regional Engineer/Standards Engineer
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: Senior Regional Engineer/Standards Engineer for Distribution Design

Question: 1 Senior Regional Engineer/Standards Engineer for Distribution Design

The Utilities are requesting 1 Senior Regional Engineer/Standards for Distribution Design. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Senior Regional Engineer/Standards Engineer – will be responsible for ensuring NDPP project designs adhere to good engineering practices. This engineer will be the subject matter expert for fire mitigation, grid resilience designs, and risk mitigation applications, and this position is expected to work with peer utilities to stay abreast of technology and protocols. The engineer will also be responsible for developing and refining preengineered fire mitigation standards for inclusion in a library of the Companies' NDPP specific design and construction standards.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Engineers and Standard Engineers for Distribution Design employees SPPC currently employees (at the date of this response). Please list the employees' title and differentiate between the positions that conduct

similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (zipped)

RESPONSE:

1) This position will be held and paid through SPPC.

- 2) This position will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) The requested Regional Engineer/Standards Engineer for Distribution Design position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at SPPC.
- 5) The requested Senior Regional Engineer/Standards Engineer for Distribution Design position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NPC.
- 6) The requested Regional Engineer/Standards Engineer for Distribution Design position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) As stated in Ms. Howard's prepared direct testimony Q&A 15, pertaining to this position, NDPP design work has been reviewed by various internal regional engineers on an ad hoc basis. In addition, electric standards support has been provided by various internal standards engineers. Listed in the attachment to the Companies' response to BCP DR 4-4 (24-12016 – BCP 4-4 - Attach 01.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&A 11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.
- 10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for this position at this point in time.
- 11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

DOCKET 24-12016: ATTACHMENT TO RESPONSE TO BCP DR 4-4

Job Title	# of Current Employees	Company	Recovery Method
Engineer II - Regional Electric - Elko Operations	1	SPPC	GRC
Senior Engineer II - Regional Electric - Carson Region	1	SPPC	GRC
Senior Engineer II - Regional Electric - Distribution Design Services, Reno	1	SPPC	GRC
Engineer I - Regional Electric - Distribution Design Services, Reno	1	SPPC	GRC
Principal Engineer - Standards - T&D Standards, Reno	1	SPPC	GRC
Engineer II - Standards - T&D Standards, Reno	1	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-05	KEYWORD:	Details of the General Foreman (GF)
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: General Foreman (GF), Distribution Design

Question: 1 General Foreman (GF), Distribution Design

The Utilities are requesting 1 General Foreman (GF) for Distribution Design. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

General Foreman – will provide lines experience within NDPP to improve consistency; providing quality assurance of design constructability and material review, and managing any standard deviations; will be the NDPP subject matter expert and liaison to connect with lines personnel in the general business units; and will develop and enforce inspection criteria that troubleshooters and inspectors use for quality assurance/quality control (“QA/QC”) of the third-party contractor work performed in fire Tiers.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all General Foreman for Distribution Design employees SPPC currently employs? Please list the employees’ title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of

these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

1) This position will be held and paid through SPPC.

- 2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) The General Foreman for Distribution Design refers to the General Line Working Foreman position at SPPC. Listed in the attachment to the Companies' response to BCP DR 4-5 (24-12016 – BCP 4-5 - Attach 01.xlsx) are the General Line Working Foreman that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) The requested General Foreman for Distribution Design position is one that exists at SPPC only. There are no employees currently in this position at NPC.
- 6) The requested General Foreman for Distribution Design position is one that exists at SPPC only. There are no employees currently in this position at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Pertaining to the requested position, the work has been performed on an ad hoc basis by existing general line working foreman at SPPC. Listed in the attachment to the Companies' response to BCP DR 4-5 (24-12016 – BCP 4-5 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.
- 10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.
- 11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 4-5

Job Title	# of Current Employees	Company	Recovery Method
Foreman, General, Line Working (Carson City)	1	SPPC	GRC
Foreman, General, Line Working (Fallon)	1	SPPC	GRC
Foreman, General, Line Working (Reno)	1	SPPC	GRC
Foreman, General, Line Working (Winnemucca)	1	SPPC	GRC
Foreman, General, Lineman, Transmission, Working - Reno	1	SPPC	GRC

DOCKET 24-12016: ATTACHMENT 02 TO RESPONSE TO BCP DR 4-5

Job Title	# of Current Employees	Company	Recovery Method
Foreman, General, Line Working (Carson City)	1	SPPC	GRC
Foreman, General, Line Working (Reno)	1	SPPC	GRC
Foreman, General, Line Working (Winnemucca)	1	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-06	KEYWORD:	Details of the Procurement Analyst
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: Procurement Analyst, Project Manager

Question: 1 Procurement Analyst, Project Manager

The Utilities are requesting 1 Procurement Analyst, Project Manager. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Procurement Analyst – will be responsible for contract administration for the large volume of contractor-dependent work. This work will include contract creation and modification, managing requests for proposals (“RFPs”), generating purchase requisitions and purchase orders, and the oversight and monitoring of contract-related ancillary functions to ensure consistency.

1) Please state if this position will be held and paid through NPC, SPCC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Procurement Analyst, Project Manager, Contract Administrator, Contract Oversight, Contract Monitoring, and RFP Managing employees SPCC currently employs. Please list the employees’ title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

1) This position will be held and paid through SPPC.

2) This position will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate

seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

3) This question is not applicable based on the response to sub-question #2 above.

4) The requested Procurement Analyst, Project Manager position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at SPPC.

5) The requested Procurement Analyst, Project Manager position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NPC.

6) The requested Procurement Analyst, Project Manager position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NV Energy, Inc.

7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

8) As stated in Ms. Howard's prepared direct testimony Q&A 16, pertaining to this position, the work is spread across various NDPP project managers. Listed in the attachment to the Companies' response to BCP DR 4-6 (24-12016 – BCP 4-6 - Attach 01.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for this position at this point in time.

11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

DOCKET 24-12016: ATTACHMENT TO RESPONSE TO BCP DR 4-6

Job Title	# of Current Employees	Company	Recovery Method
Construction Management Lead - Natural Disaster Protection	1	SPPC	NDPP with carry
Project Director - Natural Disaster Protection	1	SPPC	GRC
Project Manager - Delivery - Natural Disaster Protection	1	SPPC	GRC
Senior Project Manager - Delivery - Natural Disaster Protection	1	SPPC	GRC
Senior Project Manager - Delivery - Natural Disaster Protection	1	NPC	NDPP withy carry
Senior Project Manager - Natural Disaster Protection	2	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-07	KEYWORD:	Details of the Electrical Lines Troubleshooters
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: Electrical Lines Troubleshooters for Electrical Lines Inspection

Question: 5 Electrical Lines Troubleshooters for Electrical Lines Inspection

The Utilities are requesting 5 Electrical Lines Troubleshooters for Electrical Lines Inspections. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Troubleshooter and Electric Inspector – will initiate and prepare detailed system switching orders for NDPP system hardening and vegetation management projects that require planned outages and a qualified person to hold line clearance during the outages. These positions will also oversee NDPP third-party lines construction field work, including system hardening, grid resilience, fuse replacements, and corrections resulting from circuit patrols and detailed inspections. Electric inspectors will also perform underground inspections for excavation and substructure work by third-party civil construction crews.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Electrical Lines Troubleshooter, Planned Outages, Third-Party Line Construction Field Work employees SPPC currently employs (at the date of this response)? Please list the employees' title and differentiate between

the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to these requested positions, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to these requested positions, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why these requested positions are not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why these positions were not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how these positions are incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

1) These positions will be held and paid through SPPC.

2) These positions will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with these positions through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

3) This question is not applicable based on the response to sub-question #2 above..

4) The Electrical Lines Troubleshooter for Electrical Lines Inspections refers to the Electric Troublemans position at SPPC. Listed in the attachment to the Companies' response to BCP DR 4-7 (24-12016 – BCP 4-7 - Attach 01.xlsx) are the Electric Troublemans that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

5) The requested Electrical Lines Troubleshooter for Electrical Lines Inspections position is one that exists at SPPC only. There are no employees currently in this position at NPC.

6) The requested Electrical Lines Troubleshooter for Electrical Lines Inspections position is one that exists at SPPC only. There are no employees currently in this position at NV Energy, Inc.

7) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

8) Pertaining to this position, the work has been performed by existing electric inspectors and electric troublemen at SPPC. Listed in the attachment to the Companies' response to BCP DR 4-7 (24-12016 – BCP 4-7 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

9) In Ms. Howard's prepared direct testimony Q&A 9, Q&A 11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

11) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates.

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 4-7

Job Title	# of Current Employees	Company	Recovery Method
Troubleman, Electric (Battle Mountain)	2	SPPC	GRC
Troubleman, Electric (Carson City)	6	SPPC	GRC
Troubleman, Electric (Elko)	3	SPPC	GRC
Troubleman, Electric (Fallon)	4	SPPC	GRC
Troubleman, Electric (Reno)	10	SPPC	GRC
Troubleman, Electric (Tonopah)	2	SPPC	GRC
Troubleman, Electric (Winnemucca)	3	SPPC	GRC
Troubleman, Electric (Yerington)	2	SPPC	GRC

DOCKET 24-12016: ATTACHMENT 02 TO RESPONSE TO BCP DR 4-7

Job Title	# of Current Employees	Company	Recovery Method
Inspector, Electric (Carson City)	3	SPPC	GRC
Inspector, Electric (Fallon)	1	SPPC	GRC
Inspector, Electric (Reno)	5	SPPC	GRC
Troubleman, Electric (Battle Mountain)	2	SPPC	GRC
Troubleman, Electric (Carson City)	6	SPPC	GRC
Troubleman, Electric (Elko)	3	SPPC	GRC
Troubleman, Electric (Fallon)	4	SPPC	GRC
Troubleman, Electric (Tonopah)	2	SPPC	GRC
Troubleman, Electric (Winnemucca)	3	SPPC	GRC
Troubleman, Electric (Yerington)	2	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-30-2025
REQUEST NO:	BCP 4-08	KEYWORD:	Details of the Electrical Line Inspectors
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: Electrical Line Inspectors

Question: 2 Electrical Line Inspectors

The Utilities are requesting 2 Electrical Inspectors for Electric Lines Inspections. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Troubleshooter and Electric Inspector – will initiate and prepare detailed system switching orders for NDPP system hardening and vegetation management projects that require planned outages and a qualified person to hold line clearance during the outages. These positions will also oversee NDPP third-party lines construction field work, including system hardening, grid resilience, fuse replacements, and corrections resulting from circuit patrols and detailed inspections. Electric inspectors will also perform underground inspections for excavation and substructure work by third-party civil construction crews.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Electrical Lines Inspectors, Underground Inspectors, and Third-Party Underground Inspection employees SPPC currently employs. Please list the employees' title and differentiate between the positions that conduct

similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to these requested positions, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to these requested positions, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why these requested positions are not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why these positions were not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how these positions are incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

1) These positions will be held and paid through SPPC.

2) These positions will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with these positions through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

3) This question is not applicable based on the response to sub-question #2 above.

4) The Electrical Inspectors for Electrical Lines Inspections refers to the Electric Inspector position at SPPC. Listed in the attachment to the Companies' response to BCP DR 4-8 (24-12016 – BCP 4-8 - Attach 01.xlsx) are the Electric Inspectors that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

5) The requested Electrical Inspector for Electrical Lines Inspections position is one that exists at SPPC only. There are no employees currently in this position at NPC.

6) The requested Electrical Inspector for Electrical Lines Inspections position is one that exists at SPPC only. There are no employees currently in this position at NV Energy, Inc.

7) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

8) Pertaining to this position, the work has been performed by existing electric inspectors and electric troubleshooters at SPPC. Listed in the attachment to the Companies' response to BCP DR 4-8 (24-12016 – BCP 4-8 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry). Please note that the information in this attachment is the same as the information provided in the attachment to the Companies response to BCP DR 4-7 (24-12016 – BCP 4-7 – Attach 02.xlsx).

9) In Ms. Howard's prepared direct testimony Q&A 9, Q&A 11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

11) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates.

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 4-8

Job Title	# of Current Employees	Company	Recovery Method
Inspector, Electric (Carson City)	3	SPPC	GRC
Inspector, Electric (Fallon)	1	SPPC	GRC
Inspector, Electric (Reno)	5	SPPC	GRC

DOCKET 24-12016: ATTACHMENT 02 TO RESPONSE TO BCP DR 4-8

Job Title	# of Current Employees	Company	Recovery Method
Inspector, Electric (Carson City)	3	SPPC	GRC
Inspector, Electric (Fallon)	1	SPPC	GRC
Inspector, Electric (Reno)	5	SPPC	GRC
Troubleman, Electric (Battle Mountain)	2	SPPC	GRC
Troubleman, Electric (Carson City)	6	SPPC	GRC
Troubleman, Electric (Elko)	3	SPPC	GRC
Troubleman, Electric (Fallon)	4	SPPC	GRC
Troubleman, Electric (Tonopah)	2	SPPC	GRC
Troubleman, Electric (Winnemucca)	3	SPPC	GRC
Troubleman, Electric (Yerington)	2	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-01	KEYWORD:	Details on Distribution Outage Coordinator
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 1 Distribution Outage Coordinator for System Control

Question: The Utilities are requesting 1 Distribution Outage Coordinator for System Control. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Distribution Outage Coordinator and Distribution Operator – will research system impacts, identify potential conflicts, and perform a holistic coordination among the Companies' other planned projects. These personnel also will actively work with troubleshooters and inspectors in real-time to de-energize and re-energize facilities for NDPP projects including vegetation management, system hardening, PSOM, and emergency de-energization. These resources also respond to emergency calls, including for downed wires; unplanned outages; fire agency reports of active fires (not related to equipment caused fires); vehicle accidents; and other outage incidents. As unplanned events impact the system in conjunction with planned work on the system, system operators adjust system configurations to the extent they can maintain safe operations.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc. (collectively, the "Utility" or Utilities").

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Distribution Outage Coordinators, Outage Coordinators, De-Energizers, Emergency Call Responders, Downed Wires Responders,

Unplanned Outages, Active Fire Reporting, Vehicle Accidents, Other Outage Incidents, and Safety Operation Personnel employees SPPC currently employs (as of the date of this response). Within this response, please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

- 1) This position will be held and paid through SPPC.
- 2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) The Distribution Outage Coordinator for System Control refers to the Distribution Outage Coordinator position at SPPC. Listed in the attachment to the Companies' response to BCP DR 5-1 (24-12016 – BCP 5-1 - Attach 01.xlsx) are the Distribution Outage Coordinators that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) The requested Distribution Outage Coordinator position is one that exists at SPPC only. There are no employees currently in this position at NPC.
- 6) The requested Distribution Outage Coordinator position is one that exists at SPPC only. There are no employees currently in this position at NV Energy, Inc.
- 7) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Pertaining to this position, the work has been performed by the existing distribution outage coordinators at SPPC. Listed in the attachment to the Companies' response to BCP DR 5-1 (24-12016 – BCP 5-1 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.
- 10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.
- 11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 5-1

NML-17
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Job Title	# of Current Employees	Company	Recovery Method
Coordinator, Distribution Outage	1	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-02	KEYWORD:	Details on Distribution Operators
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 4 Distribution Operators for System Control

Question: The Utilities are requesting 4 Distribution Operator for system control. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows (see positions description in BCP 5-1 above:

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Distribution Operators for System Control, Emergency Call Responders, Downed Wires Responders, Unplanned Outages, Active Fire Reporting, Vehicle Accidents, Other Outage Incidents, and Safety Operation Personnel employees SPPC currently employs (as of the date of this response). Within this response, please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to these four requested positions, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to these requested positions, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why these requested positions are not duplicative to the positions listed in response to BCP 5-1 subsection 4), 5), and 6), in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why these positions were not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how these positions are incremental to the normal course of business of the electric utilities.

12) Please explain how these requested 4 Distribution Operator positions conduct work that is not duplicative to the requested Fire Mitigation and Emergency Response positions requested (Fire Mitigation Manager, Fire Mitigation Officer, Senior Emergency Manager Administrator).

13) Please explain how these 4 positions conduct work that is not duplicative to the Electric Lines Troubleshooters requested in this Docket.

14) Please explain how these 4 positions conduct work that is not duplicative to the Distribution Outage Coordinator position requested in this Docket.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Three (Zipped)

RESPONSE:

- 1) These positions will be held and paid through SPPC.
- 2) These positions will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) The Distribution Operators for System Control refers to the Distribution System Operator position at SPPC. Listed in the attachment to the Companies' response to BCP DR 5-2 (24-12016 – BCP 5-2 - Attach 01.xlsx) are the Distribution System Operators that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) Listed in the attachment to the Companies' response to BCP DR 5-2 (24-12016 – BCP 5-2 - Attach 02.xlsx) are the Distribution Operators that NPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 6) There are no employees currently in a distribution system operator position at NV Energy, Inc.
- 7) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Pertaining to these requested positions, the work has been performed by the existing distribution system operators at SPPC. Listed in the attachment to the Companies' response to BCP DR 5-2 (24-12016 – BCP 5-2 - Attach 03.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) The positions listed in BCP 5-1 subsection 4), 5) and 6) include one (1) distribution outage coordinator at SPPC. The requested distribution system operator positions are not duplicative of the distribution outage coordinator position because these positions fulfill different roles within SPPC's electric system control center. In reference to the detailed description of the positions listed in BCP 5-1, the distribution outage coordinator fulfills the following role: "will research system impacts, identify potential conflicts, and perform a holistic coordination among the Companies' other planned projects." In reference to that same description, the distribution system operators fulfills the following role: "will actively work with troubleshooters and inspectors in real-time to de-energize and re-energize facilities for NDPP projects including vegetation management, system hardening, PSOM, and emergency de-energization. These resources also respond to emergency calls, including for downed wires; unplanned outages; fire agency reports of active fires (not related to equipment caused fires); vehicle accidents; and other outage

incidents. As unplanned events impact the system in conjunction with planned work on the system, system operators adjust system configurations to the extent they can maintain safe operations.”. The requested distribution system operator positions perform real-time operations and controlling party functions on the electric distribution system while fulfilling the NDPP described role above. The distribution outage coordinator performs none of these real time functions. Further, in Ms. Howard’s prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

10) In Ms. Howard’s prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

11) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates.

12) The requested distribution system operator positions are non-journeyman, IBEW 1245 represented positions working in SPPC’s electric system control center in the Transmission, Distribution and Balancing Operations department. They perform real-time operations and controlling party functions on the electric distribution system while fulfilling the NDPP role in sub-response 9) above. In contrast, the requested fire mitigation and emergency response positions are non-represented (management and administrative) positions within the Natural Disaster Protection department. They do not have the real-time operating responsibilities of the distribution system operators and fulfill substantially different roles as described under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket.

13) The requested distribution system operator positions are non-journeyman, IBEW 1245 represented positions working in SPPC’s electric system control center in the Transmission, Distribution and Balancing Operations department. They perform real-time operations and controlling party functions on the electric distribution system while fulfilling the NDPP role in sub-response 9) above. In contrast, the requested electric lines troubleshooter positions are journeyman lineman, Local 1245 represented positions in various lines construction and maintenance departments. They work directly in the field on the electric distribution system, have none of the real-time operating responsibilities of the distribution system operators, and fulfill substantially different roles as described under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket.

14) Please see the response provided in subsection 9) above.

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 5-2

Job Title	# of Current Employees	Company	Recovery Method
Operator, Distribution System 1	2	SPPC	GRC
Operator, Distribution System 2	4	SPPC	GRC
Operator, Distribution System 3	1	SPPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Operator Starting, Distribution	2	NPC	GRC
Operator, Distribution	2	NPC	GRC
Operator Senior, Distribution	6	NPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Operator, Distribution System 1	2	SPPC	GRC
Operator, Distribution System 2	4	SPPC	GRC
Operator, Distribution System 3	1	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-03	KEYWORD:	Details on Senior Vegetation Management Admin
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 1 Senior Vegetation Management Administrator, Aerial NPC

Question: The Utilities are requesting 1 Vegetation Management Administrator, Aerial. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Vegetation Management Administrators (“VMA”) – will oversee approximately 15 to 25 third-party contract crews performing hazardous ground fuels removal. In this role, the VMAs replace the activities previously conducted by the Fire Mitigation Specialist and Fire Mitigation Officers. Existing VMAs will continue to coordinate and oversee 19 or more crews for traditional aerial clearance and facilitation of helicopter and logging operations as needed.

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Vegetation Management Administrators, Senior Vegetation Management Administrator, Vegetation Management, Senior Vegetation Management employees SPCC currently employees (at the date of this response). Within this response, please list the employees’ title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

- 5) Please provide the same information requested in 4) above for NPC.
- 6) Please provide the same information requested in 4) above for NV Energy, Inc.
- 7) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.
- 8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.
- 9) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.
- 10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.
- 11) Please explain how this position is incremental to the normal course of business of the electric utilities.
- 12) If the Vegetation Management Administrator is to replace the Fire Mitigation Specialist and the Fire Mitigation Officers, why are the Utilities also requesting a Fire Mitigation Manager, a Fire Mitigation Officer, and a Senior Emergency Manager Administrator in this Plan Amendment? Please explain how this work is not duplicative to the these requested positions.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Three (Zipped)

RESPONSE:

- 1) This position will be held and paid through NPC.
- 2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) Listed in the attachment to the Companies' response to BCP DR 5-3 (24-12016 – BCP 5-3 - Attach 01.xlsx) are the various vegetation management administrators that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) Listed in the attachment to the Companies' response to BCP DR 5-3 (24-12016 – BCP 5-3 - Attach 02.xlsx) are the various vegetation management administrators that NPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 6) There are no employees currently in a vegetation management administrator position at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Pertaining to the requested position, listed in the attachment to the Companies' response to BCP DR 5-3 (24-12016 – BCP 5-3 - Attach 03.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.
- 10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.
- 11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

12) The above detailed description for this position states in part “In this role, the VMAs replace the activities previously conducted by the Fire Mitigation Specialist and Fire Mitigation Officers”. To clarify this statement, the VMAs will assume responsibility only for the vegetation management activities, not all activities, previously conducted by the fire mitigation specialist and fire mitigation officers.

Job Title	# of Current Employees	Company	Recovery Method
Vegetation Management Admininstrator	2	SPPC	GRC
Senior Vegetation Management Admininstrator	2	SPPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Associate Vegetation Management Admininstrator	1	NPC	GRC
Vegetation Management Admininstrator	1	NPC	GRC

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Job Title	# of Current Employees	Company	Recovery Method
Associate Vegetation Management Admininstrator	1	NPC	GRC
Vegetation Management Admininstrator	1	NPC	GRC
Fire Management Officer	3	SPPC	NDPP with carry
Fire Mitigation Specialist	0	SPPC	NDPP with carry

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-04	KEYWORD:	Details on Senior Project Manager
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 1 Senior Project Manager for Vegetation Management

Question: The Utilities are requesting 1 Senior Project Manager for Vegetation Management. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Senior Project Manager – will strategically scope and identify job site pre-requisites and coordinate annual schedules for both aerial and hazardous ground fuels removal. This will include multi-agency coordination for helicopter operations and logging and Resilience Corridor obligations. Project managers are responsible for budget forecasts, managing cash flow, and analyzing actual costs versus estimates.

1) Please state if this position will be paid through NPC or SPPC and the anticipated annual pay including bonuses.

2) Please explain if the Utilities anticipate future recovery of this position to be paid by Ratepayers through GRC's (through the BTGR) or through the NDPP. 3) If the answer to

3) above is in a GRC (through the BTGR), please explain why these positions were not removed from the from the expenses and NDPP rate calculations requested in this current Docket.

4) Please list in a table all Project Manager, Senior Project Manager, Project Manager Vegetation Management, Senior Project Manager Vegetation Management, Budget, Forecasting employees SPPC currently employees (at the date of this response). Within this response, please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

11) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

12) Please explain how this position is incremental to the normal course of business of the electric utilities.

13) Please explain how this position is not duplicative to the Senior Operations Analyst, Compliance Reporting position requested in this current Docket as both positions are responsible for reporting requirements.

14) Please explain how this position is not duplicative to the Senior Vegetation Management Administrator, Aerial position requested in this current Docket as both positions are responsible for helicopter operations and logging.

15) Please explain how this work is not duplicative to the Fire Mitigation manager, Fire Mitigation Officer, and Senior Emergency Manager Administrator requested in this current Docket.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

- 1) This position will be held and paid through SPPC.
- 2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) The requested Senior Project Manager for Vegetation Management position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no project manager for vegetation management employees currently at SPPC.
- 5) The requested Senior Project Manager for Vegetation Management position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no project manager for vegetation management employees currently at NPC.
- 6) The requested Senior Project Manager for Vegetation Management position is one that is being developed specifically for work associated with the approved NDPP activities and programs. There are no project manager for vegetation management employees currently at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Pertaining to the requested position, the work has been performed by a combination of vegetation management, fire mitigation, and natural disaster protection personnel. Listed in the attachment to the Companies' response to BCP DR 5-4 (24-12016 – BCP 5-3 - Attach 01.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the

shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

10) Same response as sub-response 9) above.

11) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

12) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

13) This position and the Senior Operations Analyst, Compliance Reporting position fulfill substantially different roles as described in detail under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket. The Companies find no reference to "reporting requirements" in the detailed description for this position.

14) This position and the senior vegetation management administrators fulfill substantially different roles as described in detail under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket. Paraphrasing these described roles, this position is responsible for scoping and scheduling work, budget forecasts, managing cash flows, and analyzing cost variances. In contrast, the vegetation management administrators are responsible for overseeing third-party contractors performing vegetation management work in the field.

15) This position and the fire mitigation manager, fire mitigation officer, and senior emergency manager administrator positions fulfill substantially different roles as described in detail under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket. In brief, this position is responsible for vegetation management related activities performed by the Vegetation Management department. These other positions have no responsibility for vegetation management activities.

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Job Title	# of Current Employees	Company	Recovery Method
Fire Mitigation Specialist	0	SPPC	NDPP with carry
Senior Project Manager - Natural Disaster Protection	2	SPPC	GRC
Vegetation Management Admininstrator	1	NPC	GRC
Vegetation Management Admininstrator	2	SPPC	GRC
Senior Vegetation Management Admininstrator	2	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-05	KEYWORD:	Details on Vegetation Management Admin
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 5 Vegetation Management Administrator, Grounds Fuels, SPPC

Question: The Utilities are requesting 5 Vegetation Management Administrator for Grounds Fuels. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, which states as follows: Vegetation Management Administrators ("VMA") – will oversee approximately 15 to 25 third-party contract crews performing hazardous ground fuels removal. In this role, the VMAs replace the activities previously conducted by the Fire Mitigation Specialist and Fire Mitigation Officers. Existing VMAs will continue to coordinate and oversee 19 or more crews for traditional aerial clearance and facilitation of helicopter and logging operations as needed.

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Vegetation Management Administrators, Senior Vegetation Management Administrator, Vegetation Management, Senior Vegetation Management, Grounds Fuel employees SPPC currently employees (at the date of this response). Within this response, please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

- 5) Please provide the same information requested in 4) above for NPC.
- 6) Please provide the same information requested in 4) above for NV Energy, Inc.
- 7) Pertaining to Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.
- 8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.
- 9) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.
- 10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.
- 11) Please explain how this position is incremental to the normal course of business of the electric utilities.
- 12) If the Vegetation Management Administrator is to replace the Fire Mitigation Specialist and the Fire Mitigation Officers, why are the Utilities also requesting a Fire Mitigation Manager, a Fire Mitigation Officer, and a Senior Emergency Manager Administrator in this Plan Amendment? Please explain how this work is not duplicative to the these requested positions.
- 13) Please explain how these positions are not duplicative to the Senior Vegetation Management Administrator, Aerial position requested in this current Docket as all positions are responsible for helicopter operations and logging.
- 14) Please explain how this work is not duplicative to the Fire Mitigation manager, Fire Mitigation Officer, and Senior Emergency Manager Administrator requested in this current Docket.
- 15) Please explain why the Utilities need five Administrators and one Senior Administrator to oversee third-party contract crews performing ground fuel removal.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Three (Zipped)

RESPONSE:

- 1) These positions will be held and paid through SPPC.
- 2) These positions will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by external candidates. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with these positions through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) Listed in the attachment to the Companies' response to BCP DR 5-5 (24-12016 – BCP 5-5 - Attach 01.xlsx) are the various vegetation management administrators that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) Listed in the attachment to the Companies' response to BCP DR 5-5 (24-12016 – BCP 5-5 - Attach 02.xlsx) are the various vegetation management administrators that NPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 6) There are no employees currently in a vegetation management administrator position at NV Energy, Inc.
- 7) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Pertaining to the requested position, listed in the attachment to the Companies' response to BCP DR 5-5 (24-12016 – BCP 5-5 - Attach 03.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the

shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

11) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by external candidates.

12) The above detailed description for these positions states in part "In this role, the VMAs replace the activities previously conducted by the Fire Mitigation Specialist and Fire Mitigation Officers". To clarify this statement, the VMAs will assume responsibility only for the vegetation management activities, not all activities, previously conducted by the fire mitigation specialist and fire mitigation officers.

13) These positions will be focused primarily on hazardous ground fuels removal at SPPC. The requested Senior Vegetation Management Administrator, Aerial position will be focused primarily on aerial vegetation management at NPC.

14) This positions and the fire mitigation manager, fire mitigation officer, and senior emergency manager administrator positions fulfill substantially different roles as described in detail under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket. In brief, these position are responsible for vegetation management related activities performed by the Vegetation Management department. These other positions have no responsibility for vegetation management activities.

15) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

Job Title	# of Current Employees	Company	Recovery Method
Vegetation Management Admininstrator	2	SPPC	GRC
Senior Vegetation Management Admininstrator	2	SPPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Associate Vegetation Management Admininstrator	1	NPC	GRC
Vegetation Management Admininstrator	1	NPC	GRC

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Job Title	# of Current Employees	Company	Recovery Method
Fire Management Officer	3	SPPC	NDPP with carry
Fire Mitigation Specialist	0	SPPC	NDPP with carry
Vegetation Management Administrator	2	SPPC	GRC
Senior Vegetation Management Administrator	2	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-06	KEYWORD:	Details on Business Coordinator
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 1 Business Coordinator, Vegetation Management, Grounds Fuels Invoice

Question: The Utilities are requesting 1 Business Coordinator for Vegetation Management Grounds Fuels Invoice. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Business Coordinator – will be the first invoice reviewer for vegetation management activities and will also be tasked with ensuring costs tie to contract terms.

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Business Coordinator employees SPPC currently employes (at the date of this response). Within this response, please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

12) Please explain why either SPPC's, NPC's, or NV Energy Inc.'s accounts payable employees do not (currently) review invoices and ensure that invoices match contractual agreements.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

1) This position will be held and paid through SPPC.

2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

- 3) This question is not applicable based on the response to sub-question #2 above.
- 4) Listed in the attachment to the Companies' response to BCP DR 5-6 (24-12016 – BCP 5-6 - Attach 01.xlsx) are the vegetation management business coordinators that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) There are no employees currently in a vegetation management business coordinator position at NPC.
- 6) There are no employees currently in a vegetation management business coordinator position at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) As stated in Ms. Howard's prepared direct testimony Q&A 19, pertaining to this position, a combination of internal employees partnered with third-party administrator contractors perform the work. Listed in the attachment to the Companies' response to BCP DR 5-6 (24-12016 – BCP 5-6 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.
- 10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.
- 11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.
- 12) The responsibility to review invoices to ensure billing consistent with purchase order scopes, contractual terms including rate schedules, and assignment to proper project accounts resides with the business units who "own" the purchase orders and have specific knowledge on the work performed by the contractors. The Companies' accounts payable employees lack the required specific knowledge to perform these invoice reviews.

Job Title	# of Current Employees	Company	Recovery Method
Business Coordinator - Vegetation Management	1	SPPC	GRC

DOCKET 24-12016: ATTACHMENT 02 TO RESPONSE TO BCP DR 5-6

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Job Title	# of Current Employees	Company	Recovery Method
Fire Management Officer	3	SPPC	NDPP with carry
Fire Mitigation Specialist	0	SPPC	NDPP with carry

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-07	KEYWORD:	Details on Fire Mitigation Manager
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 1 Fire Mitigation Manager

Question: The Utilities are requesting 1 Fire Mitigation Manager. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Fire Prevention Manager – is the lead Fire Mitigation Officer role responsible for developing, coordinating and overseeing all fire incident response activities including the new emergency de-energization wildfire policy, liaison for fire investigations, internal and external stakeholder training, incident analysis, reporting and coordination with public safety cooperators.

1) Please confirm or deny if the Fire Mitigation Manager position is the same as the Fire Prevention Manager as described above. If deny, please provide a detailed job description for the Fire Mitigation Manager.

2) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

3) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

4) If the answer to 3) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

5) Please list in a table all Fire Mitigation Manager, Fire Manager, Fire Officer, Fire Specialist, Fire Management, Fire Prevention, Fire Prevention Manager employees SPPC currently employees (at the date of this response). Within this response, please list the employees' title and differentiate between the positions

that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

6) Please provide the same information requested in 4) above for NPC.

7) Please provide the same information requested in 4) above for NV Energy, Inc.

8) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

9) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

10) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

11) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

12) Please explain how this position is incremental to the normal course of business of the electric utilities.

13) The response to BCP 2-01 states there are two Fire Management Officers currently employed by the Utilities. The response also indicates that a Fire Management Officer and a Fire Mitigation Specialist were employed by the Utilities but the individuals with those titles "Left Company in 20024." Please explain how the position requested here for Fire Mitigation Manager is not duplicative to the positions listed in BCP 2-01.

14) Please explain how the Fire Mitigation Manager position is not duplicative to the Fire Mitigation Officer and Senior Emergency Manager Administrator requested in this current Docket.

15) Please explain how the Fire Mitigation Manager is not duplicative to the Senior Operations Analyst, Compliance Reporter and the Distribution Outage Coordinator requested in this current Docket as both positions are responsible for reporting.

16) Please explain how the Fire Mitigation Manager position is not duplicative to the five Vegetation Management Administrators requested in this current Docket as the description for the Vegetation Management Administrators states (in pertinent part) “the VMA’s replace the activities previously conducted by the Fire Mitigation Specialist and the Fire Mitigation Officers.”

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

1) The Companies confirm that the Fire Mitigation Manager position is the same as the Fire Prevention Manager as described above.

2) This position will be held and paid through SPPC.

3) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external or candidate or current dedicated internal candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

4) This question is not applicable based on the response to sub-question #3 above.

5) The requested Fire Mitigation Manager position is a new leadership position that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at SPPC.

6) The requested Fire Mitigation Manager position is a new leadership position that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NPC.

7) The requested Fire Mitigation Manager position is a new leadership position that is being developed specifically for work associated with the approved NDPP activities and programs. There are no employees currently in this position at NV Energy, Inc.

8) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP’s implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

9) Responsibility for this work has resided with the director(s) of Natural Disaster Protection. Listed in the attachment to the Companies' response to BCP DR 5-7 (24-12016 – BCP 5-7 - Attach 01.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

10) In Ms. Howard's prepared direct testimony Q&A 9, Q&A 11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

11) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

12) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate or current dedicated internal candidate.

13) The position requested is a new leadership position that will oversee all fire mitigation functions and personnel. The employees in the Fire Mitigation Officer position will be direct reports under this manager.

14) The Fire Mitigation Manager position is a new leadership position that will oversee all fire mitigation functions and personnel. The employees in the Fire Mitigation Officer and Senior Emergency Manager Administrator positions will be direct reports under this manager.

15) The Fire Mitigation Manager position is a new leadership position that will oversee all fire mitigation functions and personnel. The Senior Operations Analyst, Compliance Reporting and Distribution Outage Coordinator positions requested in this current Docket are both individual contributors in other departments and fulfill substantially different roles as described under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket.

16) As stated, the description for the Vegetation Management Administrators states (in pertinent part) "the VMA's replace the activities previously conducted by the Fire Mitigation Specialist and the Fire Mitigation Officers." To clarify this statement, the VMAs will assume responsibility only for the vegetation management activities, not all activities, previously conducted by the fire mitigation specialist and fire mitigation officers. As stated in the responses to subsections 13), 14) and 15) above, the Fire Mitigation Manager position is a new leadership position that will oversee all fire mitigation functions and personnel.

DOCKET 24-12016: ATTACHMENT 01 TO RESPONSE TO BCP DR 5-7

Job Title	# of Current Employees	Company	Recovery Method
Director - Natural Disaster Protection	0	SPPC	GRC
Director - Natural Disaster Protection - Compliance and Operations Support	0	SPPC	GRC
Director - Natural Disaster Protection - Program Execution	1	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-08	KEYWORD:	Details on Fire Mitigation Officer
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 1 Fire Mitigation Officer

Question: The Utilities are requesting 1 Fire Mitigation Officer. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, states as follows:

Fire Mitigation Officer (“FMO”) – will have a more fire specialized role going forward and will be phased out of direct control over vegetation management. FMOs will be responsible key criteria determination for emergency de-energization, root cause incident analysis of fire starts on the system in addition to fire investigations and all associated tracking and reporting; post- and predictive analysis and investigations will continue to be performed throughout the “off peak” fire season; will develop and deliver utility training to the EWG public safety partners as part of the ongoing cooperative exercises; and will develop curriculum and deliver annual wildland training and fire safety and awareness training to more than 30 internal business units, including all field operations groups.

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Fire Mitigation Manager, Fire Manager, Fire Officer, Fire Specialist, Fire Management, Fire Prevention, Fire Prevention Manager employees SPPC currently employs (at the date of this response). Within this response, please list the employees’ title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current

positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

12) The response to BCP 2-01 states there are two Fire Management Officers currently employed by the Utilities. The response also indicates that a Fire Management Officer and a Fire Mitigation Specialist were employed by the Utilities but the individuals with those titles "Left Company in 20024." Please explain how the positions requested here for Fire Mitigation Officer is not duplicative to the positions listed in BCP 2-01.

13) Please explain how the Fire Mitigation Officer position is not duplicative to the Fire Mitigation Manager and Senior Emergency Manager Administrator requested in this current Docket.

14) Please explain how the Fire Mitigation Officer position is not duplicative to the Fire Mitigation Manager requested in this current Docket in that both positions conduct fire training and safety internally.

15) Please explain how the Fire Mitigation Officer is not duplicative to the Senior Operations Analyst, Compliance Reporter and the Distribution Outage Coordinator

requested in this current Docket as both positions are responsible for tracking and reporting.

16) Please explain how the Fire Mitigation Officer position is not duplicative to the five Vegetation Management Administrators requested in this current Docket as the description for the Vegetation Management Administrators states (in pertinent part) "the VMA's replace the activities previously conducted by the Fire Mitigation Specialist and the Fire Mitigation Officers."

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

- 1) This position will be held and paid through SPPC.
- 2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #3 above.
- 4) Listed in the attachment to the Companies' response to BCP DR 5-8 (24-12016 – BCP 5-8 - Attach 01.xlsx) are the fire management officers that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) There are no fire management officer employees currently at NPC.
- 6) There are no fire management officer employees currently at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Listed in the attachment to the Companies' response to BCP DR 5-8 (24-12016 – BCP 5-8 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

12) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

13) The Fire Mitigation Manager position is a new leadership position that will oversee all fire mitigation functions and personnel. The employees in the Fire Mitigation Officer and Senior Emergency Manager Administrator positions will report under the Fire Mitigation manager and fulfill substantially different roles as described under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket.

14) As stated in the response to subsection 13), The Fire Mitigation Manager position is a new leadership position that will oversee all fire mitigation functions and personnel. The employees in the Fire Mitigation Officer position will report under the Fire Mitigation manager.

15) The Fire Mitigation Officer, Senior Operations Analyst, Compliance Reporting and Distribution Outage Coordinator positions requested in this current Docket are all assigned to different departments and fulfill substantially different roles as described under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket.

16) As stated, the description for the Vegetation Management Administrators states (in pertinent part) "the VMA's replace the activities previously conducted by the Fire Mitigation Specialist and the Fire Mitigation Officers." To clarify this statement, the VMAs will assume responsibility only for the vegetation management activities, not all activities, previously conducted by the fire mitigation specialist and fire mitigation officers.

Job Title	# of Current Employees	Company	Recovery Method
Fire Management Officer	3	SPPC	NDPP with carry

Job Title	# of Current Employees	Company	Recovery Method
Fire Management Officer	3	SPPC	NDPP with carry
Fire Mitigation Specialist	0	SPPC	NDPP with carry

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-04-2025
REQUEST NO:	BCP 5-09	KEYWORD:	Details on Senior Emergency Manager Admin
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: 1 Senior Emergency Manager Administrator

Question: The Utilities are requesting 1 Senior Emergency Manager Administrator. The detailed description for this position listed under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, which states as follows:

Emergency Manager Administrator – will be responsible for developing and facilitating tabletop emergency management exercises and training to ensure the Companies are prepared for emergency response. The manager also will oversee the volunteer Incident Management Team to ensure the Companies' individual business units are prepared for a coordinated response to emergency events.

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Fire Mitigation Manager, Fire Manager, Fire Officer, Fire Specialist, Fire Management, Fire Prevention, Fire Prevention Manager, Emergency Manager, Emergency Administrator, Emergency Manager Administrator employees SPPC currently employees (at the date of this response). Within this response, please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (though the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why this requested position is not duplicative to the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how this position is incremental to the normal course of business of the electric utilities.

12) The response to BCP 2-01 states there are two Fire Management Officers currently employed by the Utilities. The response also indicates that a Fire Management Officer and a Fire Mitigation Specialist were employed by the Utilities but the individuals with those titles "Left Company in 20024." Please explain how the position requested here for Emergency Manager Administrator is not duplicative to the positions listed in BCP 2-01.

13) Please explain how the Fire Mitigation Officer position is not duplicative to the Fire Mitigation Manager requested in this current Docket in that both positions conduct fire training and safety internally.

14) Please explain how the Emergency Manager Administrator position is not duplicative to the five Vegetation Management Administrators requested in this current Docket as the description for the Vegetation Management Administrators states (in pertinent part) "the VMA's replace the activities previously conducted by the Fire Mitigation Specialist and the Fire Mitigation Officers."

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

- 1) This position will be held and paid through SPPC.
- 2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.
- 3) This question is not applicable based on the response to sub-question #3 above.
- 4) Listed in the attachment to the Companies' response to BCP DR 5-9 (24-12016 – BCP 5-9 - Attach 01.xlsx) are the employees in these positions that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 5) There are none of these employees currently in a position at NPC.
- 6) There are none of these employees currently in a position at NV Energy, Inc.
- 7) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.
- 8) Listed in the attachment to the Companies' response to BCP DR 5-9 (24-12016 – BCP 5-9 - Attach 02.xlsx) are the job titles of the employees who have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).
- 9) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.
- 10) In Ms. Howard's prepared direct testimony Q&A 10, she explains why NV Energy identified the need for these positions at this point in time.

11) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate.

12) In Ms. Howard's prepared direct testimony Q&A 9, Q&11 and Q&A 12, she explains why the Companies require additional labor resources to execute on the approved NDPP programs, the shortfalls the labor resource plan is meant to resolve, and how the labor resource plan addresses these shortfalls.

13) The Fire Mitigation Manager position is a new leadership position that will oversee all fire mitigation functions and personnel. The employees in the Fire Mitigation Officer position will report under the Fire Mitigation manager.

14) As stated, the description for the Vegetation Management Administrators states (in pertinent part) "the VMA's replace the activities previously conducted by the Fire Mitigation Specialist and the Fire Mitigation Officers." To clarify this statement, the VMAs will assume responsibility only for the vegetation management activities, not all activities, previously conducted by the fire mitigation specialist and fire mitigation officers. Further, the Senior Emergency Manager Administrator and Vegetation Management Administrator positions are assigned to different departments and will fulfill substantially different roles as described under Table 4, Adjusted Labor Resource Plan for Approved NDPP Programs, in the NDPP First Amendment in the current Docket.

Job Title	# of Current Employees	Company	Recovery Method
Fire Management Officer	3	SPPC	NDPP with carry

Job Title	# of Current Employees	Company	Recovery Method
Fire Management Officer	3	SPPC	NDPP with carry
Fire Mitigation Specialist	0	SPPC	NDPP with carry

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-01	KEYWORD:	Hazard Awareness Analysts
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 5 Hazard Awareness Analysts – Staff 6, BCP 3-1

Question: The response to BCP 3-1 indicates that the Utilities are requesting 5 Hazard Awareness Analysts. The NDPP Plan Amendment does not include a description for these five positions. The response to Staff 6 provides the following description: Performs real-time detection and monitoring of hazard conditions by leveraging multiple technology and intelligence to detect and monitor hard risks across the Company's service territories and alert functional internal and external partners to emerging threats of assets, potential utility caused risk and/or hazard to community, customers and company infrastructure. Documents occurrence of pre-identified hazard or threats. Background and experience must be in the application of the Incident Command System, Emergency Management, wildland fire behavior and GIS.

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc. (collectively, the "Utility" or Utilities").

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why these positions (as an OMAG expense) were not removed from the NDPP rate calculations in this current Docket.

4) Pertaining to these five requested positions, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

5) Pertaining to these five requested positions, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

6) Please explain in detail how and why these requested positions are not duplicative from other positions requested in this current Docket, including: Senior Operations Analyst, Distribution Outage Coordinator, Distribution Operator, Fire Mitigation Manager, Fire Mitigation Officer, and Senior Emergency Manager Administrator.

7) Please explain why these positions were not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

8) Please explain how these positions are incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

1) These positions will be held and paid through SPPC.

2) These positions will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with these positions through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

3) This question is not applicable based on the response to sub-section 2) above.

4) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

5) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 30 and Q&A 31, these positions are in support of a new proposed NDPP program and new work functions that have not previously existed at the Companies.

6) Please refer to the Companies response to subsection 5).

7) Please refer to the Companies response to subsection 5).

8) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be dedicated to work associated with new, approved NDPP activities and programs and will likely be filled by external candidates because the required job skill is more common externally.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-02	KEYWORD:	Distribution Automation Manager
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 1 Distribution Automation Manager- Staff 6, BCP 3-1

Question: The response to BCP 3-1 indicates that the Utilities are requesting 1 Distribution Automation Manager. The NDPP Plan Amendment does not include a description for this position. The response to Staff 6 provides the following description: Oversees strategic placement, coordination and programming for all distribution automations functions targeting risk mitigation and sectionalizing to minimize reliability impacts of pro-active de-energization.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Pertaining to this one requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please include and list in a table the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

5) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain

why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

6) Please explain in detail how and why this requested position is not duplicative from other positions requested in this current Docket, including: Senior Operations Analyst, Distribution Outage Coordinator, Distribution Operator, Fire Mitigation Manager, Fire Mitigation Officer, and Senior Emergency Manager Administrator.

7) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

8) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

1) This position will be held and paid through SPPC.

2) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

3) This question is not applicable based on the response to sub-section 2) above.

4) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

5) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, this position is in support of a new proposed NDPP program and new work function that has not previously existed at the Companies.

6) Please refer to the Companies response to subsection 5).

7) Please refer to the Companies response to subsection 5).

8) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with new, approved NDPP activities and programs and will likely be filled by an external candidate.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-03	KEYWORD:	Electrical Engineer II
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 1 Electrical Engineer II - Staff 6, BCP 3-1

Question: The response to BCP 3-1 indicates that the Utilities are requesting 1 Electrical Engineer II. The NDPP Plan Amendment does not include a description for this position. The response to Staff 6 provides the following description: Performs studies to determine where additional devices are needed to better sectionalize circuits based in fire Tier areas, coordinating device settings for TripSavers, line reclosers, and substation breakers/reclosers.

1) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

2) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

3) Please list in a table all Electrical Engineer, Electrical Engineer I, and Electrical Engineer II employees SPPC currently employs (at the date of this response). Please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

4) Please provide the same information requested in 4) above for NPC.

5) Please provide the same information requested in 4) above for NV Energy, Inc.

6) Pertaining to this requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s)' job title

and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

7) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

8) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

9) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

10) Please explain how this position is incremental to the normal course of business of the electric utilities.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Three (Zipped)

RESPONSE:

1) This position will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

2) This question is not applicable based on the response to sub-section 1) above.

3) The Electrical Engineer II refers to the regional electrical engineer positions at the Companies. Listed in the attachment to the Companies' response to BCP DR 8-3 (24-12016 – BCP 8-3 - Attach 01.xlsx) are the regional electrical engineers that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

4) Listed in the attachment to the Companies' response to BCP DR 8-3 (24-12016 – BCP 8-3 - Attach 02.xlsx) are the regional electrical engineers that NPC currently employs. The table

includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

5) There are no employees currently in these positions at NV Energy, Inc.

6) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

7) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, this position is in support of a new proposed NDPP program and new work function that has not previously existed at the Companies. The Companies currently do not have a department focused on field technology specific to distribution line automation or NDPP. Existing regional engineers who might be used for distribution automation are already fully utilized with day-to-day operations; however, they have been utilized to support work involving coordination of settings between devices like TripSavers, line reclosers, and substation breakers/reclosers to ensure proper operation during normal and fire season operations. Listed in the attachment to the Companies' response to BCP DR 8-3 (24-12016 – BCP 8-3 - Attach 03.xlsx) are the job titles of the employees who have performed this work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

8) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, this position is in support of a new proposed NDPP program and new work function that has not previously existed at the Companies.

9) Please refer to the Companies response to subsection 8).

10) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with new, approved NDPP activities and programs and will likely be filled by an external candidate.

Job Title	# of Current Employees	Company	Recovery Method
Eng I - Regional Electric - Trouble Response & Inspection, Reno	2	SPPC	GRC
Engineer II - Regional Electric - Elko Operations	1	SPPC	GRC
Senior Engineer II - Regional Electric - Carson Region	1	SPPC	GRC
Engineer I - Regional Electric - Distribution Design Services, Reno	1	SPPC	GRC
Senior Engineer II - Regional Electric - Distribution Design Services, Reno	1	SPPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Engineer II - Regional Electric - Lines Construction and Maintenance, Las Vegas	1	NPC	GRC
Engineer II - Regional Electric - Distribution Design Services, Las Vegas	2	NPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Eng I - Regional Electric - Trouble Response & Inspection, Reno	2	SPPC	GRC
Engineer II - Regional Electric - Elko Operations	1	SPPC	GRC
Senior Engineer II - Regional Electric - Carson Region	1	SPPC	GRC
Engineer II - Regional Electric - Lines Construction and Maintenance, Las Vegas	1	NPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-04	KEYWORD:	Journeyman Lineman
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 4 Journeyman Lineman – Staff 6, BCP 3-1

Question: The response to BCP 3-1 indicates that the Utilities are requesting 4 Journeyman Lineman. The NDPP Plan Amendment does not include a description for this position. The response to Staff 6 provides the following description: Performs installation of new and maintenance of existing devices.

1) Please state if these positions will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of these positions from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Please list in a table all Lineman, Journeyman Lineman employees SPPC currently employees (at the date of this response). Please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

5) Please provide the same information requested in 4) above for NPC.

6) Please provide the same information requested in 4) above for NV Energy, Inc.

7) Pertaining to these requested positions, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title

and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

8) Pertaining to these requested positions, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

9) Please explain how and why these requested positions are not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

10) Please explain why these positions were not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

11) Please explain how these positions are incremental to the normal course of business of the electric utilities.

12) Please explain in detail how and why these requested positions are not duplicative from other positions requested in this current Docket, including: Utility Design Administrator, Senior Regional Engineer/Standards Engineer, General Foreman, Electrical Lines Inspectors, and Electrical Lines Troubleshooters.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Three (Zipped)

RESPONSE:

1) These positions will be held and paid through SPPC.

2) These positions will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with these positions through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

3) This question is not applicable based on the response to sub-section 2) above.

4) Listed in the attachment to the Companies' response to BCP DR 8-4 (24-12016 – BCP 8-4 - Attach 01.xlsx) are the linemen that SPPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

5) Listed in the attachment to the Companies' response to BCP DR 8-4 (24-12016 – BCP 8-4 - Attach 02.xlsx) are the linemen that NPC currently employs. The table includes the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

6) There are no employees currently in these positions at NV Energy, Inc.

7) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

8) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, these positions are in support of a new proposed NDPP program and new work function that has not previously existed at the Companies. The Companies currently do not have a department focused on field technology specific to distribution line automation or NDPP. Existing internal linemen resources have been utilized to support some installation and operations work, primarily operations of TripSavers. Listed in the attachment to the Companies' response to BCP DR 8-4 (24-12016 – BCP 8-4 - Attach 03.xlsx) are the lineman positions in the operations centers that have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

9) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, these positions are in support of a new proposed NDPP program and new work function that has not previously existed at the Companies.

10) Please refer to the Companies response to subsection 9).

11) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be dedicated to work associated with new, approved NDPP activities and programs and will likely be filled by external candidates.

12) The 4 requested journeyman lineman positions comprise a line crew that will perform lines construction, maintenance, and operations work on the electric distribution system. The Utility Design Administrator and Senior Regional Engineer/Standards Engineer are non-journeyman lineman positions and are not qualified to perform such work. While the General Foreman, Electrical Lines Inspector, and Electrical Lines Troubleshooter positions are journeyman lineman positions, they work independently from the line crews and support different functions as described in the Labor Resource Plan for Approved Programs (Section 2.1 of the First Amendment).

Job Title	# of Current Employees	Company	Recovery Method
Lineman, Electric - Carson Operations	11	SPPC	GRC
Lineman, Electric - Elko Operations	4	SPPC	GRC
Lineman, Electric - Fallon Operations	5	SPPC	GRC
Lineman, Electric - Lines Construction and Maintenance, Reno	21	SPPC	GRC
Lineman, Trans (Traveling) - Lines Construction and Maintenance, Reno	6	SPPC	GRC
Lineman, Electric - Winnemucca Operations	3	SPPC	GRC
Lineman, Electric - Yerington Operations	4	SPPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Journeyman Lineman - Beltway Complex, Las Vegas	44	NPC	GRC
Lead Lineman - Beltway Complex, Las Vegas	8	NPC	GRC
Journeyman Lineman - Ryan Operations Center, Las Vegas	35	NPC	GRC
Lead Lineman - Ryan Operations Center, Las Vegas	10	NPC	GRC
Journeyman Lineman - Laughlin	4	NPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Lineman, Electric - Carson Operations	11	SPPC	GRC
Lineman, Electric - Elko Operations	4	SPPC	GRC
Lineman, Electric - Fallon Operations	5	SPPC	GRC
Lineman, Electric - Lines Construction and Maintenance, Reno	21	SPPC	GRC
Lineman, Electric - Winnemucca Operations	3	SPPC	GRC
Lineman, Electric - Yerington Operations	4	SPPC	GRC
Journeyman Lineman - Ryan Operations Center, Las Vegas	35	NPC	GRC
Lead Lineman - Ryan Operations Center, Las Vegas	10	NPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-05	KEYWORD:	Distribution SCADA, Relay Technician
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 2 Distribution SCADA, Relay Technician – Staff 6, BCP 3-1

Question: The response to BCP 3-1 indicates that the Utilities are requesting 2 Distribution SCADA Relay Technician. The NDPP Plan Amendment does not include a description for this position. The response to Staff 6 provides the following description: Performs Coordinates setting between devices as directed by the electrical engineer. Sets up and maintains the operational technology for the program.

1) Please state if this position will be held and paid through NPC, SPPC, or NV Energy, Inc.

2) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

3) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

4) Pertaining to these requested positions, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s)' job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

5) Pertaining to these requested positions, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain

why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

6) Please explain how and why these requested positions are not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

7) Please explain why these positions were not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

8) Please explain how these positions are incremental to the normal course of business of the electric utilities.

9) Please explain in detail how and why these requested positions are not duplicative from other positions requested in this current Docket, including: Electrical Engineer II and 4 Journey Lineman.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: One (Zipped)

RESPONSE:

1) These positions will be held and paid through SPPC.

2) These positions will be prioritized for work associated with the approved NDPP activities and programs and will likely be filled by external candidates. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with these positions through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

3) This question is not applicable based on the response to sub-section 2) above.

4) The requested positions are in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

5) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, these positions are in support of a new proposed NDPP program and new work function that has not previously existed at the Companies. The Companies currently do not have a department

focused on field technology specific to distribution line automation or NDPP. Existing internal relay electrician and relay technician resources have been utilized to support projects that include work associated with the installation or maintenance of protective devices and automatic controls. Listed in the attachment to the Companies' response to BCP DR 8-5 (24-12016 – BCP 8-5 - Attach 01.xlsx) are the positions in the operations centers that have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

6) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, these positions are in support of a new proposed NDPP program and new work function that has not previously existed at the Companies.

7) Please refer to the Companies response to subsection 6).

8) These positions are anticipated to be incremental to the normal course of business of the electric utilities as they will be dedicated to work associated with new, approved NDPP activities and programs and will likely be filled by external candidates.

9) The Relay Technician position is an IBEW Local 1245 represented journeyman substation electrician position. The Electrical Engineer II and Journeyman Lineman positions are non-journeyman substation electrician positions and are not qualified to perform such work.

Job Title	# of Current Employees	Company	Recovery Method
Lead Relay Electrician -Ryan Operations Center, Las Vegas	2	NPC	GRC
Relay Electrician II -Ryan Operations Center, Las Vegas	5	NPC	GRC
Relay Electrician III -Ryan Operations Center, Las Vegas	3	NPC	GRC
Relay Technician, Reno	3	SPPC	GRC
Senior Relay Technician, Elko	1	SPPC	GRC
Senior Relay Technician, Reno	4	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-06	KEYWORD:	Construction Administrator Coordinator
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 1 Construction Administrator Coordinator – Staff 6, BCP 3-1

Question: The response to BCP 3-1 indicates that the Utilities are requesting 1 Construction Administrator Coordinator. The NDPP Plan Amendment does not include a description for this position. The response to Staff 6 provides the following description: Prepares and stages work packages including materials and coordination of departmental schedules, and project close out.

1) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

2) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

3) Please list in a table all Construction Coordinator, Construction Administrator, Construction Manager employees SPPC currently employs (at the date of this response). Please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

4) Please provide the same information requested in 4) above for NPC.

5) Please provide the same information requested in 4) above for NV Energy, Inc.

6) Pertaining to this requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s)' job title

and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

7) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

8) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

9) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

10) Please explain how this position is incremental to the normal course of business of the electric utilities.

11) Please explain in detail how and why this requested position is not duplicative from other positions requested in this current Docket, including: Senior Operations Analysis, Utility Design Administrator, Procurement Analyst, Vegetation Management Administrator, Senior Project Manager, Business Coordinator, Fire Prevention Manager, Fire Mitigation Officer, and Emergency Manager Administrator.

12) Please explain in detail how and why this requested position is not duplicative from the NDPP-dedicated positions of Construction Manager Lead in which the Utility claims is a NDPP-dedicated position in its response to BCP 2-1.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

1) This position will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate

seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

2) This question is not applicable based on the response to sub-section 1).

3) The requested Construction Administrator Coordinator position is one that is being developed specifically for work associated with the approved NDPP activities under the requested distribution automation program. While there are no employees currently in this position at SPPC, there are employees in the Construction Administrator position. The Companies' response to BCP DR 8-6 (24-12016 – BCP 8-6 - Attach 01.xlsx) includes a table listing the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

4) The requested Construction Administrator Coordinator position is one that is being developed specifically for work associated with the approved NDPP activities under the requested distribution automation program. While there are no employees currently in this position at NPC, there are employees in the Construction Coordinator position. The Companies' response to BCP DR 8-6 (24-12016 – BCP 8-6 - Attach 02.xlsx) includes a table listing the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

5) There are no employees currently in these positions at NV Energy, Inc.

6) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

7) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, this position is in support of a new proposed NDPP program and new work function that has not previously existed at the Companies. The requested Construction Administrator Coordinator position is one that is being developed specifically for work associated with the approved NDPP activities under the requested distribution automation program.

8) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, this position is in support of a new proposed NDPP program and new work function that has not previously existed at the Companies.

9) Please refer to the Companies response to subsection 8).

10) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with new, approved NDPP activities and programs and will likely be filled by an external candidate.

11) The requested Construction Administrator Coordinator position is one that is being developed specifically for work associated with the approved NDPP activities under the requested distribution automation program. The requested Senior Operations Analysis, Utility Design Administrator, Procurement Analyst, Vegetation Management Administrator, Senior Project

Manager, Business Coordinator, Fire Prevention Manager, Fire Mitigation Officer, and Emergency Manager Administrator support different functions as described in the Labor Resource Plan for Approved Programs (Section 2.1 of the First Amendment).

12) The requested Construction Administrator Coordinator position is one that is being developed specifically for work associated with the approved NDPP activities under the requested distribution automation program. In contrast, the existing Construction Manager Lead primarily performs functions in support of the construction activities associated with of NDPP capital system hardening programs.

Job Title	# of Current Employees	Company	Recovery Method
Construction Administrator	3	SPPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Construction Coordinator	6	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-21-2025
REQUEST NO:	BCP 8-07	KEYWORD:	Telecommunications Technician
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: 1 Telecommunications Technician – Staff 6, BCP 3-1

Question: The response to BCP 3-1 indicates that the Utilities are requesting 1 Telecommunications Technician. The NDPP Plan Amendment does not include a description for this position. The response to Staff 6 provides the following description: Performs field work associated to telecommunications required for distribution.

1) Please explain if the Utilities anticipate future recovery of this position from Ratepayers to be through GRCs (through the BTGR, without carry) or through the NDPP with carry.

2) If the answer to 2) above is in a GRC through the BTGR, please explain why this position (as an OMAG expense) was not removed from the NDPP rate calculations in this current Docket.

3) Please list in a table all Telecommunications Technician employees SPPC currently employs (at the date of this response). Please list the employees' title and differentiate between the positions that conduct similar responsibilities. Please indicate if recovery of these current positions will be requested from Ratepayers in a GRC (through the BTGR) or in the NDPP with carry.

4) Please provide the same information requested in 4) above for NPC.

5) Please provide the same information requested in 4) above for NV Energy, Inc.

6) Pertaining to this requested position, for all work conducted prior to the NDPP's implementation in 2019, who at SPPC, NPC, or NV Energy, Inc. has been performing this work? Please list in a table and include the employee(s)' job title

and indicate who the employee(s) was employed through. If no one conducted this work, please explain why.

7) Pertaining to this requested position, for all NDPP work from 2019 until the present, who at SPPC, NPC, or NV Energy Inc. has been performing this work? Please list in a table and include the employee(s) job title and indicate who the employee(s) was employed through. If no one conducted this work, please explain why. For each employee listed in response, please indicate if the recovery of this position will be (or already has been) requested from Ratepayers through a GRC (through the BTGR) or through the NDPP with carry.

8) Please explain how and why this requested position is not duplicative from the positions listed in responses above, in which Ratepayers are already paying for (or will be requested to pay for in the future) through a GRC (through the BTGR) or the NDPP.

9) Please explain why this position was not requested in prior NDPP Plans, NDPP Plan Amendments, NDPP Regulatory Asset Dockets, or Utility GRCs.

10) Please explain how this position is incremental to the normal course of business of the electric utilities.

11) Please explain in detail how and why this requested position is not duplicative from other positions requested in this current Docket, including: Distribution Scada Relay Technician.

12) Please explain in detail how and why this requested position is not duplicative from the NDPP-dedicated positions of Customer Communications Specialist in which the Utility claims is a NDPP-dedicated position in its response to BCP 2-1.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Three (Zipped)

RESPONSE:

1) This position will be dedicated to work associated with the approved NDPP activities and programs and will likely be filled by an external candidate. Therefore, the Companies anticipate seeking recovery of the OMAG expenses associated with this position through the NDPP regulatory asset with carry until such time that recovery can be included in a GRC.

2) This question is not applicable based on the response to sub-section 1).

3) The requested Telecommunications Technician refers to the communications technician positions at SPPC. The Companies' response to BCP DR 8-7 (24-12016 – BCP 8-7 - Attach 01.xlsx) includes a table listing the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

4) The Companies assume BCP intended to reference sub-question 3) above. The comparable positions at NPC to the communications technician positions at SPPC are the communications electrician positions. The Companies' response to BCP DR 8-7 (24-12016 – BCP 8-7 - Attach 02.xlsx) includes a table listing the job titles of the employees, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

5) There are no employees currently in these positions at NV Energy, Inc.

6) The requested position is in support of work associated with the approved NDPP activities and programs. Prior to the NDPP's implementation in 2019, there was no such work conducted, and therefore, there was no one performing such work.

7) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, these positions are in support of a new proposed NDPP program and new work function that has not previously existed at the Companies. The Companies currently do not have a department focused on field technology specific to distribution line automation or NDPP. Existing internal communication technician resources have been utilized to support projects that include telecommunications equipment support. Listed in the attachment to the Companies' response to BCP DR 8-7 (24-12016 – BCP 8-7 - Attach 03.xlsx) are the positions that have performed the work, the number of current employees in the job, the company through which they are employed, and the recovery method (GRC or NDPP with carry).

8) As described in Ms. Howard's prepared direct testimony Q&A 29, Q&A 33 and Q&A 34, this position is in support of a new proposed NDPP program and new work function that has not previously existed at the Companies.

9) Please refer to the Companies response to subsection 8).

10) This position is anticipated to be incremental to the normal course of business of the electric utilities as it will be dedicated to work associated with new, approved NDPP activities and programs and will likely be filled by an external candidate.

11) The Communications Technician position is an IBEW Local 1245 represented telecommunications journeyman position. The Relay Technician position is not a telecommunications journeyman position and is not qualified to perform such work.

12) The Communications Technician position is an IBEW Local 1245 represented telecommunications journeyman position. The Customer Communications Specialist is a position

within SPPC's Corporate Communications department that is not a telecommunications journeyman position and is not qualified to perform such work.

Job Title	# of Current Employees	Company	Recovery Method
Communications Technician	7	SPPC	GRC
Communications Systems Technician	3	SPPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Communications Electrician II	11	NPC	GRC
Lead Communications Electrician	3	NPC	GRC

Job Title	# of Current Employees	Company	Recovery Method
Communications Technician	7	SPPC	GRC
Communications Systems Technician	3	SPPC	GRC

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	03-14-2025
REQUEST NO:	BCP 9-04	KEYWORD:	Staff 6, BCP 3-1, BCP 8-11 Follow-up Response
REQUESTER:	BCP	RESPONDER:	Philavanh, ShazzyLynn

REQUEST:

Reference: NDPP Labor – Staff 6, BCP 3-1, BCP 8-11

Question: NDPP Labor – Staff 6, BCP 3-1, BCP 8-11

The response to BCP 8-11 is only partially responsive. Please answer the following:

1) The utilities state there are currently 2 Senior Project Managers for Delivery (NDPP dedicated labor). Which entity – SPPC, NPC, or NVE Inc. – pays for these two positions? The response states “1 Position NPC & SPPC / 1 Position SPPC” which is 3 total positions and not 2.

2) The utilities state there is currently 1 Fire Mitigation Specialist (NDPP dedicated labor). Which entity – SPPC, NPC, or NVE Inc. – pays for this position? The response states “NPC & SPPC” but the BCP is under the impression that there is only one position and not two – and that each position must be initially paid through one specific entity.

3) The utilities state there is currently 1 Construction Manager Lead (NDPP dedicated labor). Which entity – SPPC, NPC, or NVE Inc. – pays for this position? The response states “NPC & SPPC” but the BCP is under the impression that there is only one position and not two – and that each position must be initially paid through one specific entity.

4) The utilities state there is currently 1 Principal Meteorologist (NDPP dedicated labor). Which entity – SPPC, NPC, or NVE Inc. – pays for this position? The response states “NPC & SPPC” but the BCP is under the impression that there is only one position and not two – and that each position must be initially paid through one specific entity.

5) The utilities state there is currently 1 Senior NDPP Data Scientist (NDPP

dedicated labor). Which entity – SPPC, NPC, or NVE Inc. – pays for this position? The response states “NPC & SPPC” but the BCP is under the impression that there is only one position and not two – and that each position must be initially paid through one specific entity.

6) The utilities state there is currently 1 Meteorologist (NDPP dedicated labor). Which entity – SPPC, NPC, or NVE Inc. – pays for this position? The response states “NPC & SPPC” but the BCP is under the impression that there is only one position and not two – and that each position must be initially paid through one specific entity.

7) The utilities state there is currently 1 Customer Communications Specialist (NDPP dedicated labor). Which entity – SPPC, NPC, or NVE Inc. – pays for this position? The response states “NPC & SPPC” but the BCP is under the impression that there is only one position and not two – and that each position must be initially paid through one specific entity.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The response to BCP 8-11 correctly indicates the total number of positions by position title. Generally, one position can support a project that occurs in SPPC and a project that occurs in NPC. For example, in BCP 8-11, the Companies stated there is one position for Principal Meteorologist. The attachment in BCP 8-11 also stated that one position will support both NPC and SPPC. The Principal Meteorologist will charge to the applicable NPC projects and he/she will also charge to the applicable SPPC projects. The Principal Meteorologist's labor will be sought for recovery in the applicable jurisdiction based on the projects he/she charges to.

For question 1-7, please refer to BCP 8-11, attach 01 for the number of positions by position title and if that position would support SPPC, NPC or both.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	03-14-2025
REQUEST NO:	BCP 9-01	KEYWORD:	BCP 8-05 (5) Union Labor
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: NDPP Labor – 2 Relay Technicians

Question: NDPP Labor – 2 Relay Technicians The response to BCP 8-5, subpart 5, states (in part), “The Relay Technician position is an IBEW Local 1245 represented journeyman substation electrician position.”

1) Are these two Relay Technicians requested represented (union) labor positions? Please confirm or deny and explain.

2) It is the BCP’s understanding from the Modified Order in Docket No. 22-03006, paragraph 29, recovery of represented labor costs (unionized labor) was denied in the NDPP regulatory asset account. Please provide the utilities’ rationale for including represented labor in the NDPP amendment request as part of the NDPP regulatory asset.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

1) Yes, as explained in the Company’s response to BCP 8-05, subpart 9.

2) In paragraph 28 of the Modified Final Order in Docket No. 22-03006, the Commission found that “represented labor costs sought for recovery as incremental NDPP labor in the instant NDPP docket are derived from a subset of existing employees who allocate a portion of their time to NDPP activities and not new positions solely dedicated to the NDPP.” In paragraph 29, the Commission found that those represented labor costs were not incremental to the utilities’

normal course of business because “NV Energy's BTGRs are already collecting revenue to pay for labor costs of a larger workforce than the workforce that NV Energy currently employs” and the Companies “did not incur additional labor costs beyond the labor costs that were contemplated when the Commission set BTGRs in GRC proceedings.” Accordingly, the Commission denied recovery of the Companies' requested represented labor costs. Unlike the represented labor costs in Docket No. 22-03006, here the Relay Technician positions are new proposed NDPP positions, not existing positions that are being recovered in Sierra's or Nevada Power's BTGR.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	03-14-2025
REQUEST NO:	BCP 9-02	KEYWORD:	BCP 8-7 (12) Union Labor
REQUESTER:	BCP	RESPONDER:	Costello, Brian (NV Energy)

REQUEST:

Reference: NDPP Labor – Telecommunications Technician

Question: NDPP Labor – Telecommunications Technician

The response to BCP 8-7, subpart 12, states (in part), “The Communications Technician position is an IBEW Local 1245 represented telecommunications journeyman position.”

1) Is the position requested a represented (union) labor position? Please confirm or deny and explain.

2) It is the BCP’s understanding from the Modified Order in Docket No. 22-03006, paragraph 29, recovery of represented labor costs (unionized labor) was denied in the NDPP regulatory asset account. Please provide the utilities’ rationale for including represented labor in the NDPP amendment request as part of the NDPP regulatory asset.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

1) Yes, as explained in the Company’s response to BCP 8-07, subpart 12.

2) In paragraph 28 of the Modified Final Order in Docket No. 22-03006, the Commission found that “represented labor costs sought for recovery as incremental NDPP labor in the instant NDPP docket are derived from a subset of existing employees who allocate a portion of their

time to NDPP activities and not new positions solely dedicated to the NDPP.” In paragraph 29, the Commission found that those represented labor costs were not incremental to the utilities’ normal course of business because “NV Energy’s BTGRs are already collecting revenue to pay for labor costs of a larger workforce than the workforce that NV Energy currently employs” and the Companies “did not incur additional labor costs beyond the labor costs that were contemplated when the Commission set BTGRs in GRC proceedings.” Accordingly, the Commission denied recovery of the Companies’ requested represented labor costs. Unlike the represented labor costs in Docket No. 22-03006, here the Telecommunications Technician position is a new proposed NDPP position, not an existing position that is being recovered in Sierra’s or Nevada Power’s BTGR

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-13-2025
REQUEST NO:	BCP 6-02	KEYWORD:	NDPP 2024, 2025-26 Organizational Charts
REQUESTER:	BCP	RESPONDER:	Costello, Brian

REQUEST:

Reference: NDPP Organizational Charts

Question: 1) Please include the 2024 NDPP organization chart, as it was in 2024 prior to this amended request, clearly identifying all positions that are NDPP-dedicated positions and those that are not. Please include individuals' names and titles.

2) Please include the proposed 2025-26 NDPP organization chart, clearly identifying all positions that are NDPP-dedicated positions and those that are not. Please include the new 46 positions requested in this instant Docket. Please include individuals' names and titles and if a position is vacant, please indicate so.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: Two (Zipped)

RESPONSE:

1) The attachment to the Companies' response to BCP DR 6-2 (24-12016 – BCP 6-2 - Attach 01.pdf) is an organization chart for the Companies' Natural Disaster Protection (NDP) departments that was current as of October 31, 2024. A text label has been placed under each position identifying it as "NDPP w/ Carry" (NDPP dedicated) or "GRC" (not NDPP dedicated). Katie Jo Colier, Customer Communications Specialist in the Companies' Corporate Communications department, is also an NDPP dedicated employee. Her position exists outside of the NDPP departments and is therefore not shown in the provided organization chart. The

“NDPP w/ Carry” and “GRC” identifiers were used on the organization chart to remain consistent with similar identifiers used in BCP’s fourth and fifth sets of data requests.

2) The attachment to the Companies' response to BCP DR 6-2 (24-12016 – BCP 6-2 - Attach 02.pdf) is the proposed organization chart for the Companies' Natural Disaster Protection (NDP) departments. Of the 46 positions requested in this instant Docket, 34 would reside inside the NDPP departments. These positions have been included in the proposed organization chart. The remaining 12 positions would exist outside of the NDPP departments and are therefore not shown in the proposed organization chart. The remaining 12 positions include the Distribution Outage Coordinator, Distribution Operator, Troubleshooter, and Electric Inspector positions. These would reside in the Grid Operations and Reliability department (SPPC) and in various regional Delivery Operations departments (SPPC).

NV Energy Organization

Dir, ND Protn Prog Execution
Howard, Danyale M
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

GRC

Sr Project Manager-Delivery
Zaccagnino, Daniel A
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

NDPPP w/ Carry

Project Director
Costello, Brian J
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

GRC

Mgr, Vegetation Management ED
Young, Mark Drexler
Organization : Electric Delivery
Department : Vegetation Management

GRC

Mgr, Trans and Dist Projects
Morgan, William Daniel
Organization : Natural Disaster Protected
Department : Natural Disaster Protected

GRC

Sr Utility Design Admin
Robertson, Jill Lynn
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

GRC

Sr NDPPP Data Scientist
Zuniga, Francesco
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

NDPPP w/ Carry

GIS Analyst
Davis, Emma Nicole
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

GRC

Meteorologist II
Freimeau, Paul Graham
Organization : Natural Disaster Protected
Department : Natural Disaster Protected

NDPPP w/ Carry

Fire Management Officer
Grove, Aaron Michael
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

NDPPP w/ Carry

Fire Management Officer
Vacant
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

GRC

Sr Regulatory Compl Analyst
Vacant
Organization : Natural Disaster Protection
Department : Emergency Management

GRC

Fire Management Officer
Lucas, Scott P
Organization : Natural Disaster Protected
Department : Natural Disaster Protected

NDPPP w/ Carry

Principal Meteorologist
Hoon, Alexander David
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

NDPPP w/ Carry

Fire Mitigation Spcst - Trans
Regan, Mark P
Organization : Natural Disaster Protection
Department : Natural Disaster Protection

NDPPP w/ Carry

Sr Emergency Mgmt Admin
Vacant
Organization : Natural Disaster Protection
Department : Emergency Management

GRC

Sr Emergency Mgmt Admin
Hill, Timothy Scott
Organization : Natural Disaster Protected
Department : Emergency Management

GRC

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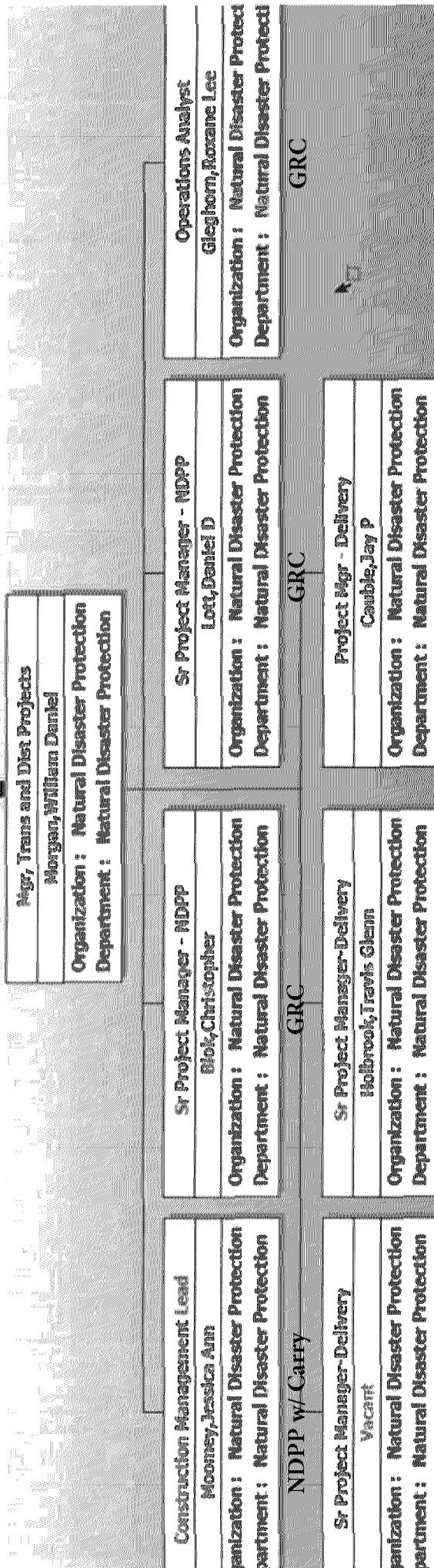
NV Energy Organization

Mgr, Vegetation Management ED
Young, Mark Drexler
Organization : Electric Delivery
Department : Vegetation Management

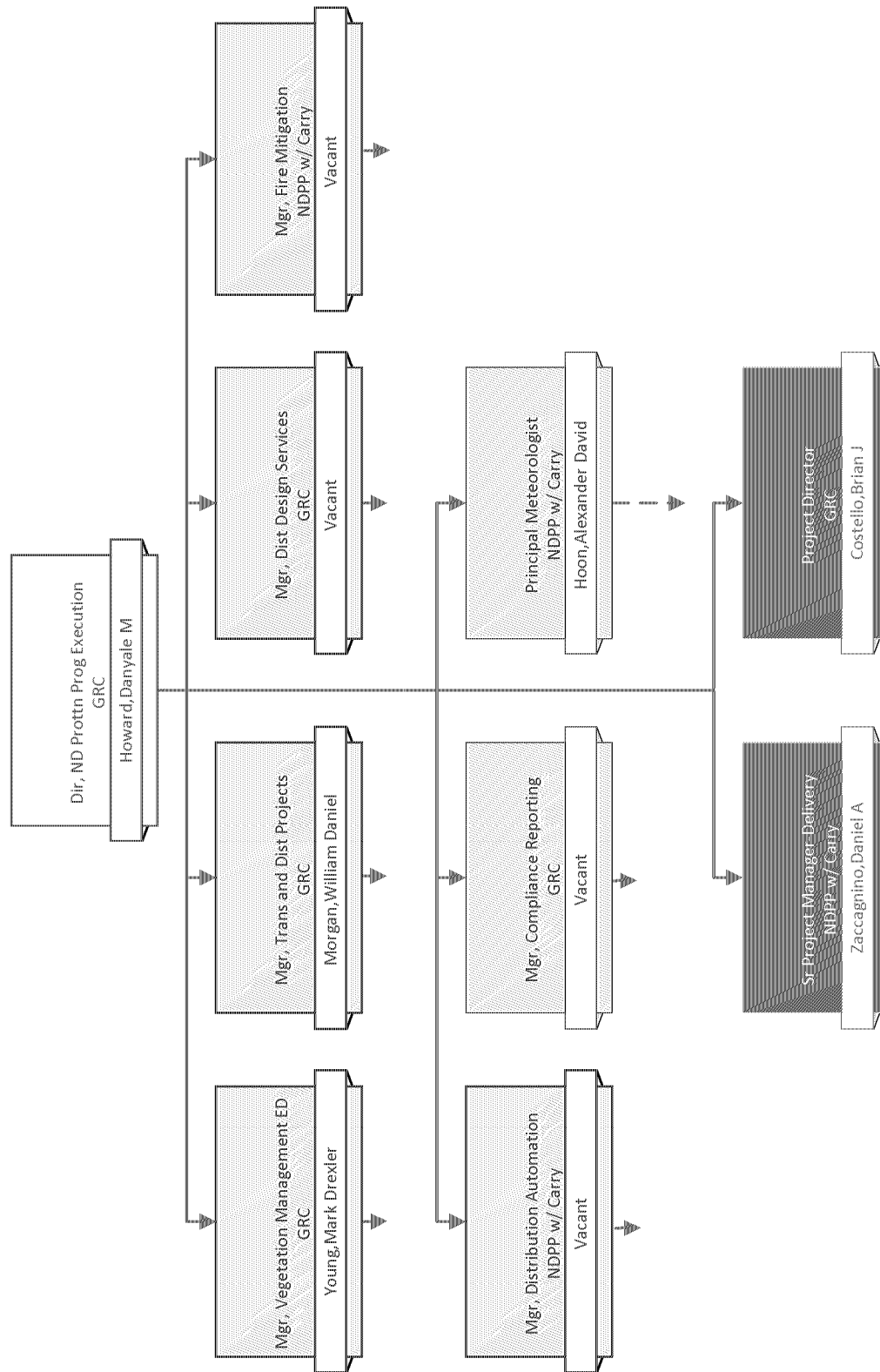
Vegetation Mgmt Admin	Assoc Vegetation Mgmt Admin	Vegetation Mgmt Admin	Sr Vegetation Mgmt Admin
Vacant	Lee, Kenneth Micheal	Marica, Florinel	Grogan, Kevin McCoy
Organization : Electric Delivery	Organization : Electric Delivery	Organization : Electric Delivery	Organization : Electric Delivery
Department : Vegetation Management	Department : Vegetation Management	Department : Vegetation Management	Department : Vegetation Management
GRC	GRC	GRC	GRC
Sr Vegetation Mgmt Admin	Vegetation Mgmt Admin	Business Coordinator	Sr Project Manager-Delivery
Fassett, Gerald	Tuvell, Joseph Patrick	Olimedo, Pearl Ann	Vacant
Organization : Electric Delivery	Organization : Electric Delivery	Organization : Electric Delivery	Organization : Natural Disaster Protection
Department : Vegetation Management	Department : Vegetation Management	Department : Vegetation Management	Department : Natural Disaster Protection
GRC	GRC	GRC	GRC

Nichole M. Loar
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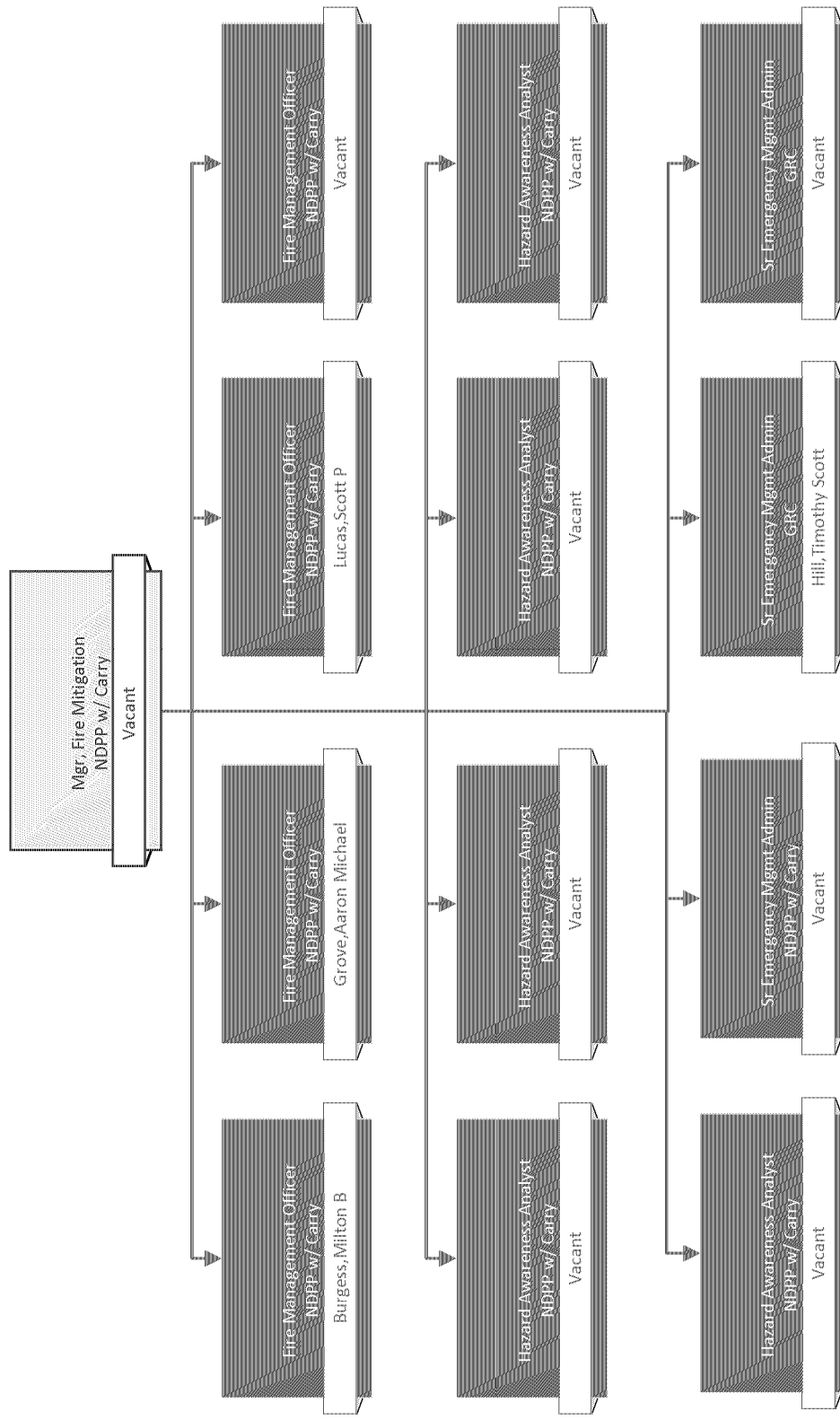
NV Energy Organization



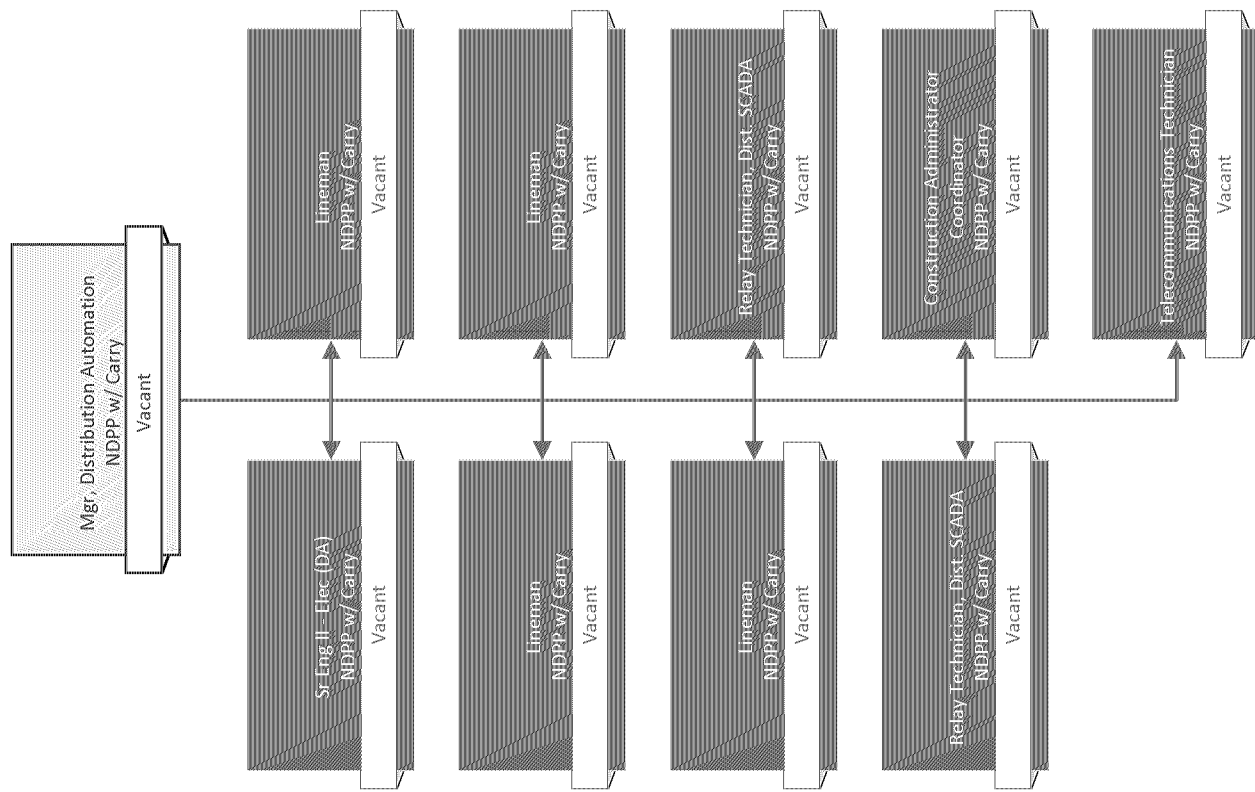
Natural Disaster Protection – Proposed Organization



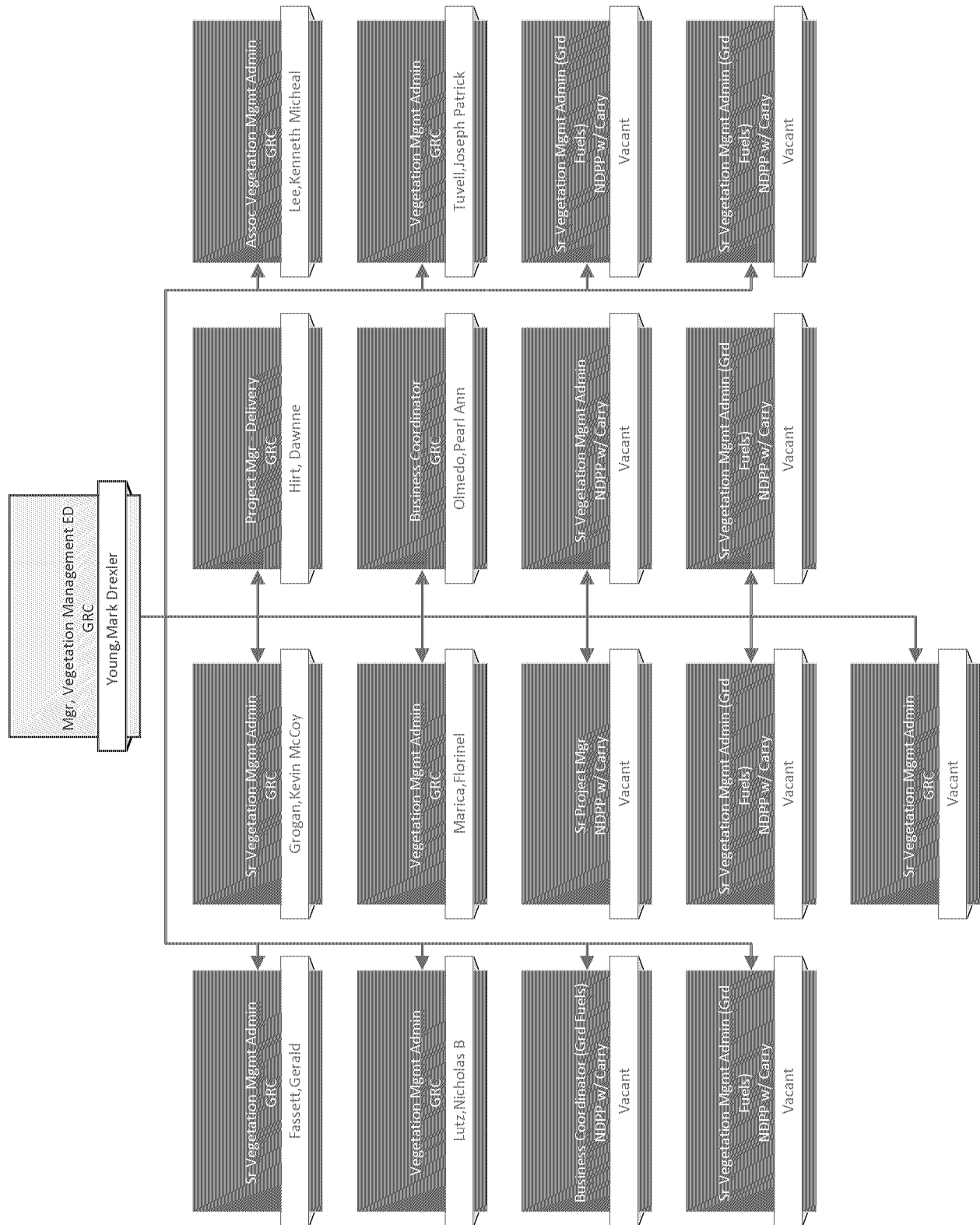
Natural Disaster Protection – Proposed Organization



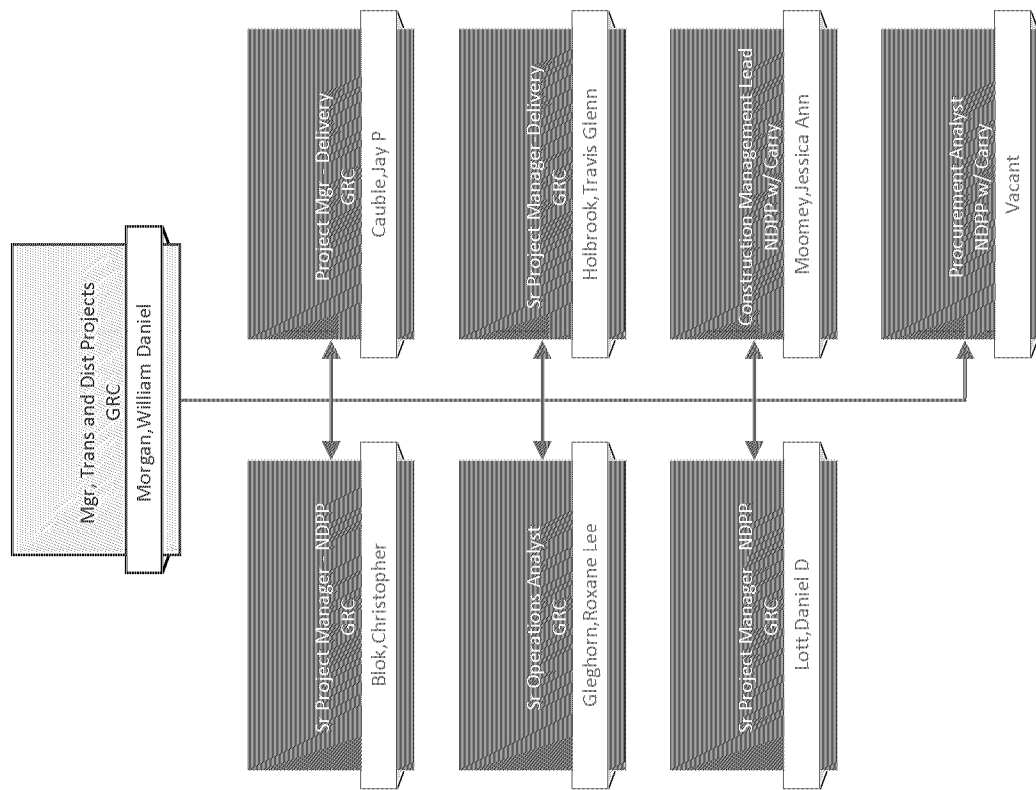
Natural Disaster Protection – Proposed Organization



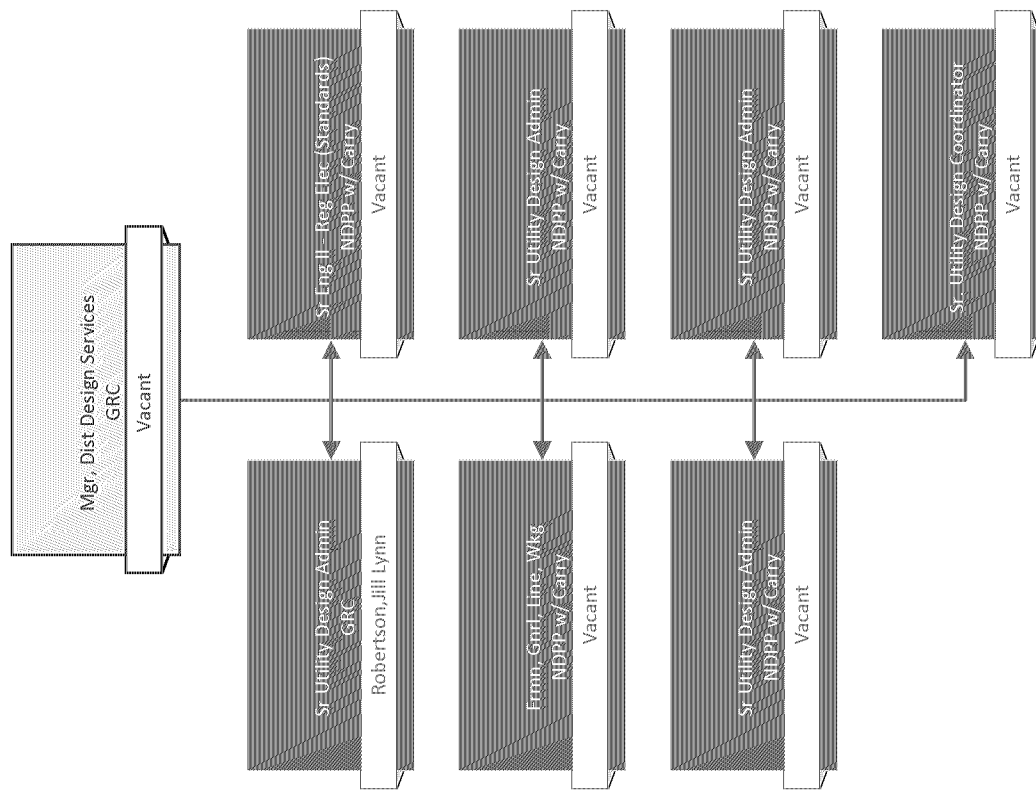
Natural Disaster Protection – Proposed Organization



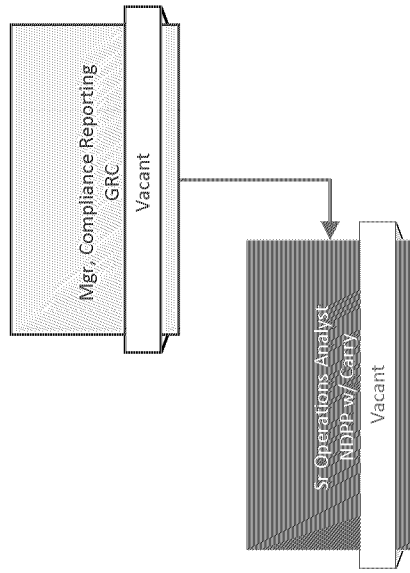
Natural Disaster Protection – Proposed Organization



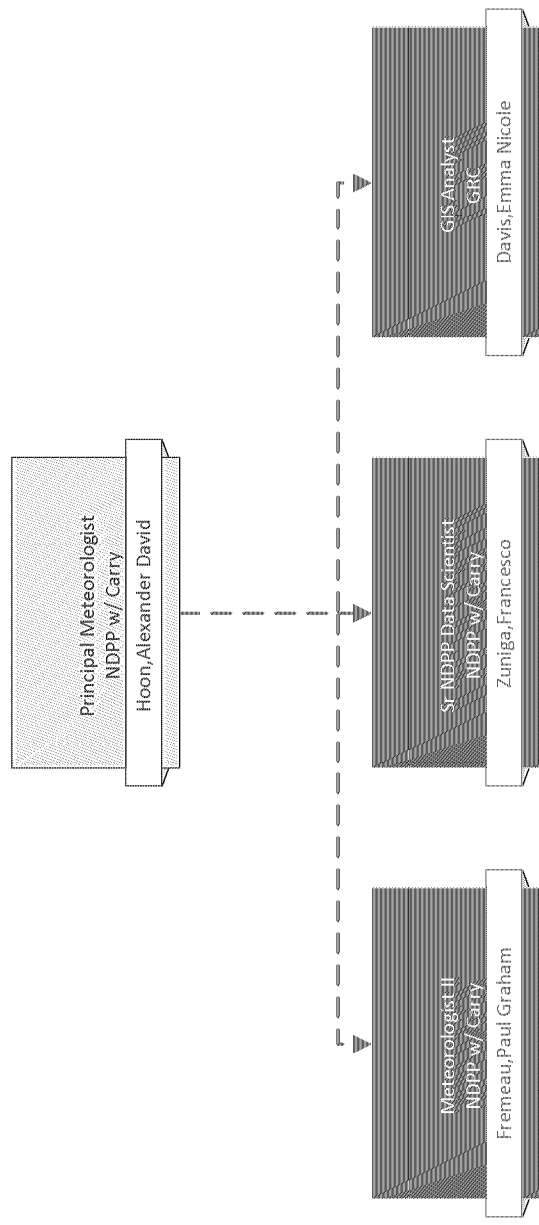
Natural Disaster Protection – Proposed Organization



Natural Disaster Protection – Proposed Organization



Natural Disaster Protection – Proposed Organization



NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-03-2025
REQUEST NO:	Staff 46	KEYWORD:	New Positions Under General Rates
REQUESTER:	Lucban	RESPONDER:	Costello, Brian

REQUEST:

Reference: Labor Resources

Question: For each of the 31 new positions proposed under the Adjusted Labor Resources Plan and the 15 new positions proposed under Distribution Automation and the Hazard Awareness Desk, please explain whether NV Energy would still hire these positions and include those costs under general rates (e.g. operations and maintenance revenue requirement costs), in each service territory's next rate case, if the Commission were to find that regulatory asset accounting treatment was unnecessary or inappropriate. If not, please explain, and expound on whether NV Energy would seek recovery in a similar fashion with or without requesting regulatory asset treatment and with or without carrying charges in any other regulatory proceeding.

Please contact Percy Lucban with any clarification questions pertaining to the above request.

RESPONSE CONFIDENTIAL (yes or no): No

ATTACHMENT CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

Yes, for the 46 positions in the resource plan, the Companies would proceed with filling the positions and include the costs under general rates if the Commission was to find that regulatory

asset accounting treatment was unnecessary or inappropriate. The Companies believe these resources are critical to the delivery of the NDPP and that past precedent and regulation requires the Companies to seek approval for plan changes, including personnel additions. As such, it was appropriate to include these resources in the plan amendment and defer implementation pending Commission review. The Companies believe these resources are incremental, and as such, the costs should be included for regulatory asset recovery treatment until such time as they can be included in general rates. That said, the Companies believe these resources represent important NDPP advancements, and as such, barring negative input from the Commission on the need for these additions, would begin implementation in 2025 under a general rate strategy if the Commission so desires.

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	01-10-2025
REQUEST NO:	BCP 1-01	KEYWORD:	Shelton-Patchell Executables
REQUESTER:	BCP	RESPONDER:	Shelton-Patchell, Cary (NV Energy)

REQUEST:

Reference: NDPP Customer Rate Impacts

Question: Please provide all intact executable workpapers used to support all figures stated in Ms. Shelton-Patchell's Prepared Direct Testimony and Exhibits.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

The following executables provided with the filing support all figures stated in Ms. Shelton-Patchell's Prepared Direct Testimony and Exhibits:

- SheltonPatchell Direct-2_Rate Cac_FINAL.xlsx
- SheltonPatchell Direct-3_Res Bill Impact_FINAL.xlsx
- SheltonPatchell Testimony Tables 2,3,4_FINAL.xlsx

Ln	(a)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	
1	Carry Charge	6.95% effective 01/01/2023 to 09/30/2024													Summary of Annual Activity
2		2.33% excluding equity component effective 10/01/2024													
3															
4															
5	PERIOD 6 (2024 Cost Recovery)														
6	Account No. 182-3XX														
7	Capital Costs														
8	Depreciation Expense	\$	123,399	\$	123,399	\$	123,399	\$	123,399	\$	123,399	\$	123,399	\$	1,480,792
9	Return on Rate Base	206,098	218,940	231,781	244,623	257,464	270,306	283,147	295,988	308,830	321,671	334,513	347,354	360,196	3,276,140
10	Subtotal	329,098	342,339	355,180	368,023	380,863	393,705	406,546	419,388	432,229	445,071	457,913	470,754	483,596	4,856,033
11	Beginning Balance	\$	-	\$	327,193	\$	667,137	\$	1,019,833	\$	1,385,280	\$	1,763,479	\$	2,154,430
12	Distribution - 97.87%	322,467	335,034	347,602	360,169	372,736	385,304	397,871	410,439	423,006	435,574	448,142	460,710	473,278	-
13	Transmission - 2.13% (Demand Allocator 67.22% / 64.27%)	4,726	4,910	5,094	5,278	5,463	5,647	5,831	6,015	6,199	6,384	6,568	6,752	6,936	4,733,956
14															68,764
15															6,719
16	2024 Total Capital Balance for Recovery	\$	327,193	\$	667,137	\$	1,019,833	\$	1,385,280	\$	1,763,479	\$	2,154,430	\$	2,538,133
17															\$
18	OMAG Costs														
19	Beginning Balance	\$	-	\$	4,311,201	\$	8,647,372	\$	13,008,656	\$	17,395,199	\$	21,807,148	\$	26,244,649
20	Distribution - 96.25%	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	4,125,591	49,507,091
21	Transmission - 3.75%	160,785	160,785	160,785	160,785	160,785	160,785	160,785	160,785	160,785	160,785	160,785	160,785	160,785	1,929,424
22	Subtotal	4,286,376	8,597,578	12,933,748	17,295,032	21,680,159	26,093,524	30,531,025	34,994,227	39,483,278	43,988,238	48,500,048	52,957,248	57,464,544	51,436,514
23	Carrying Charge Period 6 - Dist	23,894	47,926	72,098	96,410	120,862	145,456	170,193	195,072	220,096	245,166	270,282	295,448	320,664	1,362,936
24	Carrying Charge Period 6 - Trans	931	1,868	2,810	3,757	4,710	5,669	6,633	7,602	8,578	9,554	10,530	11,506	12,482	53,117
25	Total OMAG - Distribution	4,149,485	417,317	419,689	422,001	424,463	427,047	429,584	432,163	434,742	437,321	439,900	442,479	445,058	4,861,879
26	Total OMAG - Transmission	161,717	162,653	163,959	165,443	166,927	168,411	169,895	171,379	172,863	174,347	175,831	177,315	178,799	1,929,424
27															51,436,514
28	2024 Total OMAG Balance for Recovery	\$	4,311,201	\$	8,647,372	\$	13,008,656	\$	17,395,199	\$	21,807,148	\$	26,244,649	\$	30,707,851
29															\$
30	2024 Ending Balance for Recovery	\$	4,638,394	\$	9,314,509	\$	14,028,489	\$	18,780,489	\$	23,570,627	\$	28,399,079	\$	33,265,984
31															\$
32															\$
33															\$
34	PERIOD 7 (2025 Cost Recovery)														
35	Account No. 182-3XX														
36	Capital Costs														
37	Depreciation Expense	\$	212,209	\$	212,209	\$	212,209	\$	212,209	\$	212,209	\$	212,209	\$	2,546,506
38	Return on Rate Base	380,089	402,287	425,485	448,183	470,880	493,578	516,276	538,974	561,672	584,369	607,067	629,765	652,463	6,053,125
39	Subtotal	592,298	614,996	637,694	660,392	683,089	705,787	728,485	751,183	773,880	796,578	819,276	841,974	864,672	8,609,632
40	Beginning Balance	\$	-	\$	587,783	\$	1,198,090	\$	1,830,923	\$	2,468,280	\$	3,164,152	\$	3,864,568
41	Distribution - 97.87%	579,660	601,783	624,087	646,300	668,513	690,727	712,940	735,154	757,367	779,581	801,794	824,008	846,221	-
42	Transmission - 11.62%	8,123	8,814	9,746	10,678	11,610	12,542	13,474	14,406	15,338	16,270	17,202	18,134	19,066	8,422,004
43															118,023
44															11,547
45	2025 Total Capital Balance for Recovery	\$	587,783	\$	1,198,090	\$	1,830,923	\$	2,468,280	\$	3,164,152	\$	3,864,568	\$	4,569,499
46															\$
47	OMAG Costs														
48	Beginning Balance	\$	-	\$	4,861,933	\$	9,733,296	\$	14,614,109	\$	19,504,388	\$	24,404,154	\$	29,313,423
49	Distribution - 88.38%	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	4,290,467	51,485,606
50	Transmission - 11.62%	562,053	562,053	562,053	562,053	562,053	562,053	562,053	562,053	562,053	562,053	562,053	562,053	562,053	6,744,538
51	Subtotal	4,852,520	9,714,453	14,585,816	19,466,629	24,356,909	29,246,674	34,136,943	39,027,716	43,918,489	48,809,262	53,699,935	58,590,608	63,481,281	58,230,243
52	Beginning Balance	\$	8,322	\$	16,661	\$	25,001	\$	33,341	\$	41,681	\$	50,021	\$	58,361
53	Carrying Charge Period 7 - Dist	8,322	16,661	25,001	33,341	41,681	50,021	58,361	66,701	75,041	83,381	91,721	100,061	108,401	633,772
54	Carrying Charge Period 7 - Trans	1,090	2,180	3,270	4,360	5,450	6,540	7,630	8,720	9,810	10,900	11,990	13,080	14,170	85,644
55	Total OMAG - Distribution	4,298,289	4,307,128	4,315,967	4,324,806	4,333,645	4,342,484	4,351,323	4,360,162	4,369,001	4,377,840	4,386,679	4,395,518	4,404,357	52,139,378
56	Total OMAG - Transmission	563,143	564,236	565,329	566,422	567,515	568,608	569,701	570,794	571,887	572,980	574,073	575,166	576,259	6,830,282
57															57,716
58															58
59	2025 Total OMAG Balance for Recovery	\$	4,861,933	\$	9,733,296	\$	14,614,109	\$	19,504,388	\$	24,404,154	\$	29,313,423	\$	34,222,215
60															\$
61	2025 Ending Balance for Recovery	\$	5,449,716	\$	10,931,387	\$	16,445,031	\$	21,960,688	\$	27,568,315	\$	33,177,991	\$	38,819,714
62															\$

[illegible]

NV Energy

RESPONSE TO INFORMATION REQUEST

DOCKET NO:	24-12016	REQUEST DATE:	02-18-2025
REQUEST NO:	BCP 7-06	KEYWORD:	BCP 1-03 Amendment
REQUESTER:	BCP	RESPONDER:	Shelton-Patchell, Cary (NV Energy)

REQUEST:

Reference: NDPP Carry, Rate Impacts, GRC's – Response to BCP 1-3

Question: The response to BCP 1-3, parts 2) and 3) were non-responsive.

BCP 1-3, part 2) states, "Please explain why NDPP calculations (including carry) for SPPC and NPC do not account for transitioning NDPP costs to respective GRCs (BTGR rates) given that NPC has confirmed a 2025 GRC and SPPC has speculated to a 2026 GRC. If deny, please explain."

Utilities responded, "Please see last bullet point in Ms. Shelton-Patchell's Q&A 12 in her Prefilled Direct Testimony."

BCP 1-3, part 3) states, "Please point to the witness and portion of the current Docket that address NDPP cost transitions (i.e. which costs will be moved to the Utilities' next respective GRC to be collected from the BTFR) and where those costs are removed from corresponding rate impacts in this current Docket. If none exist, please explicitly state so and provide an answer explain why."

The Utilities responded, "See response to 2)."

The response to this request references Ms. Shelton-Patchell's Q&A 12 in her Prepared Direct Testimony. Unfortunately, this Q&A does not specifically address or explain why NDPP calculations (including carry) for SPPC and NPC do not account for transitioning NDPP costs to respective GRCs via the BTGR rates, given that NPC has confirmed a 2025 GRC and SPPC has speculated to a 2026 GRC.

1) Please answer the original questions.

2) If the Utilities have contemplated how and when transitioning NDPP charges to their respective GRC's this transition would occur and work, please provide that information in the form of a detailed discussion.

3) If the Utilities have not yet contemplated transitioning NDPP charges to their respective GRCs, please explicitly state so.

4) Please provide any and all internal communication (including affiliate communication) regarding the transitioning of the NDPP charges and NDPP rates to their respective GRCs.

RESPONSE CONFIDENTIAL (yes or no): No

TOTAL NUMBER OF ATTACHMENTS: None

RESPONSE:

Response to 1):

BCP 1-03 Part 2)

As explained in the last bullet point in Ms. Shelton-Patchell's Q&A 12 in her Prefiled Direct Testimony, the rates were calculated based on the balancing account recovery mechanism to provide the Commission a reasonable basis to evaluate the impact of this filing. Implementing a transition to GRC cost recovery within this amendment filing would not provide an apples-to-apples comparison demonstrating the impact of the first amendment requests, especially because the GRC cost recovery mechanism has not yet been implemented.

BCP 1-03 Part 3) Ms. Shelton-Patchell in last bullet point of her Prefiled Direct Testimony discloses that the rates calculated for this application are based on the balancing account mechanism. Therefore, Ms. Shelton-Patchell testifies that the costs requested in this filing do not reflect recovery of the requested NDPP costs through a NDPP GRC rate.

Response to 2):

This responder is not aware of any formal discussions within the Companies contemplating how and when transitioning NDPP charges to GRC recoveries.

Based on the adopted regulations, the Companies will recover prudently incurred NDPP costs through the balancing account mechanism until NDPP GRC recovery rates are effective. The GRC filed for NPC on February 14, 2025, occurred prior to the March 2, 2025, date that the adopted regulations require inclusion of a proposed separate rate in a GRC filing.

By statute, NPC is not required to file another GRC until February 14, 2028, which would assume a rate effective date of October 1, 2028, for the GRC rates. Therefore, all the costs in this

amendment filing for NPC will be recovered through the balancing account mechanism since this NDPP recovery period is for NDPP costs incurred during the fiscal years of 2024 through 2026.

By statute, SPPC is not required to file another GRC until February 23, 2027, which would assume a rate effective date of October 1, 2027, for the GRC rates. Therefore, all the costs in this amendment filing for SPPC will be recovered through the balancing account mechanism since this NDPP recovery period is for NDPP costs incurred during the fiscal years of 2024 through 2026.

If SPPC elects to file a 2026 GRC, all NDPP costs incurred until the rate effective date of such filing will be recovered through the balancing account mechanism. The rate effective date is dependent upon when the GRC filing is made, but if a February 2026 filing is assumed, the rate effective date would be October 1, 2026. Therefore, the assumption used in this filing that all 2026 costs would be recovered through the balancing account mechanism is reasonable since if SPPC files a 2026 GRC, most of the NDPP costs incurred during 2026 for SPPC will be recovered through the balancing account.

Response to 3):
Please see response to 2).

Response to 4):
Please see response to 2). A comprehensive search for internal correspondence regarding all potential mentions of this topic has not been conducted and, as noted above, the responder is not aware of any formal discussions within the Companies determining how and when NDPP charges will be transitioned to GRC recoveries.