

SOUTHWEST GAS CORPORATION,
Appellant,

vs.

PUBLIC UTILITIES COMMISSION OF
NEVADA,
Respondent.

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Elizabeth A. Brown
Clerk of Supreme Court

The PUCN joins NRA's Motion to Participate given NRA's unique position of representing large, sophisticated businesses directly affected by PUCN proceedings, including ratemaking proceedings. Specifically, NRA has a membership that has a substantive background and familiarity with rate case proceedings before the PUCN, and it is uniquely situated to provide the Court with a valuable perspective of a group of ratepayers who would be negatively affected by the potential resolution of this case should Southwest Gas Corporation prevail on the thoroughly-briefed issue of whether the rebuttable presumption of prudence is founded in the Constitution.

MEMORANDUM OF POINTS AND AUTHORITIES

On March 19, 2021, this Court granted NRA's Motion for Leave to File Amicus Curiae Brief. NRA's *amicus* brief focused on the single issue of whether utilities are entitled to a presumption of prudence in general rate case proceedings before the PUCN. On August 3, 2021, this Court issued an order scheduling oral argument in this case for September 10, 2021, and allotted 60 minutes for argument. NRA filed the Motion to Participate pursuant to NRAP 29(h) and seeks permission to participate in oral argument for this matter and offers that extraordinary reasons support this request.

The PUCN welcomes NRA's input, joins in the arguments presented by NRA in its motion, and incorporates those arguments by reference herein. NRA is well-positioned to answer complex questions on the practical effect any resolution by this Court would have on large customers and large employers. Also, as a frequent participant in ratemaking proceedings before the PUCN, NRA has the experience and competence to explain how recognition of a Constitutionally-based rebuttable presumption of prudence would fundamentally change the way in which large customers of public utilities may effectively participate in ratemaking proceedings before the PUCN.

For the foregoing reasons, the PUCN joins in the Motion to Participate filed by NRA.

Dated this 26th day of August, 2021.

THE PUBLIC UTILITIES COMMISSION OF NEVADA

by: /s/ GARRETT WEIR
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Public Utilities Commission of Nevada and that on this date I electronically filed and served copies of the foregoing **Joinder in Support of Nevada Resort Association's Motion to Participate in Oral Argument** with the Clerk of the Court for the Nevada Supreme Court by using the CM/ECF filing system to the following:

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Dated this August 26, 2021.

/s/ SHAYLA HOOKER
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