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Nevada: Renewable Energy Policy Landscape

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Introduction

Nevada, the Silver State, has long been shaped by risk-takers. From mining booms and railroad expansion to military installations and the legalization of gambling, the state has repeatedly leveraged unconventional strategies to drive economic growth in a harsh and resource-constrained landscape. That same pattern of calculated risk can be seen in the state's energy system. With limited fossil fuel resources, the state built the largest dam of its time - the Hoover dam - to utilize untapped hydropower in the desert. Today, new technologies enable Nevada to capture the desert sun, tap the heat stored deep in its mountain basins, and harvest winds shaped by rugged slopes - transforming a once-forbidden landscape into a potential renewable powerhouse.

Over the past decade, Nevada has undergone a significant transformation of its electricity mix, retiring coal while expanding natural gas, solar, and geothermal resources. Policies such as Renewable Portfolio Standards and tax abatements have accelerated renewable deployment. Despite this progress, Nevada's clean energy trajectory faces challenges. Inconsistent state climate planning, regulatory incentives that influence utility investment decisions, and the vast amount of land under federal management create uncertainty regarding long-term decarbonization efforts. At the same time, electricity demand is rising quickly due to population growth and data centers. This paper examines Nevada's renewable energy policy landscape, focusing on how state policy, utility regulation, and federal land governance interact to shape recent development and can influence the state's energy transition going forward.

Economic, Demographic, & Geographical Context

Population Demographics

Nevada has an estimated population of 3.3 million.¹ Nevada is also one of the fastest growing states in the country. Over 97% of that growth has been located in the two most populous counties, Clark and Washoe.² The urban cores of those counties, the Las Vegas and Reno Metropolitan Areas respectively, have been undergoing rapid development. The rest of the state remains a mixed bag with almost half of the rural counties experiencing population decline while the others see little growth. The population densities vary widely across counties too, ranging from Esmeralda County's 0.2 to Carson City's 403.81 people per square mile.

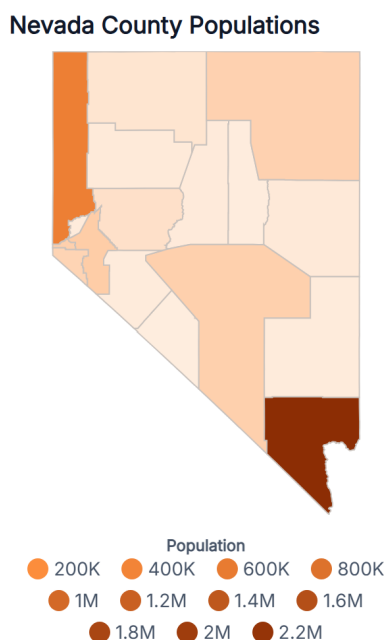


Figure 1: A map of Nevada depicting the distribution of the population within the state on the county-level as of 2024. The darker the color, the greater the population of that county. (World Population Review)³

As shown in Figure 1, Clark County, located on the southern tip of the state, is home to more than 2.2 million people, most of whom live in the Las Vegas Valley. Washoe County, in the northwestern corner of the state, is home to around 507,000 residents, with a majority living in the Reno-Sparks area.

Economy

The state's three largest economic sectors are Real Estate, Accommodation and Food Services, and Healthcare and Social Assistance; they account for 16.68%, 13.58%, and 7.34% of GDP, respectively.⁴ The largest economic sectors by employment are Accommodation and Food Services (16.87%), Transportation and Warehousing (14.51%), and Retail Trade (13.21%). The mining sector in Nevada has seen an 8.9% decline in its GDP contribution over the last five years, calling into question recent efforts to expand mining.

A vast majority of the economic activity in Nevada occurs in Clark and Washoe counties, with Clark County alone responsible for around 63% of the state's GDP as of 2023.⁵ The high share of real estate in the state's GDP is partly due to the state's recent population growth.⁶ Tourism-related sectors are mostly centered around Las Vegas and Reno. In recent years, the state has tried to lessen its reliance on relatively volatile sectors like tourism and retail by investing in healthcare, critical mineral mining, and tech.⁷

Public Land

Nevada has the highest proportion of federal public land among the lower 48 states—85.9% of its area is owned and managed by federal agencies.⁸ The Bureau of Land Management (BLM) is the largest, managing 83.9% of Nevada's public lands or 63% of the state. It is distantly followed by the US Forest Service (10% of public land), the Fish and Wildlife Service (4%), the

National Park Service (1.3%) and the Department of Defense (0.49%).⁹ The amount of state-owned land is very small (345,000 acres)¹⁰ and local government-owned lands are almost nonexistent (0 acres in 13 out of 17 counties).¹¹ Tribal governments in Nevada hold 1.6 million acres of land.¹²

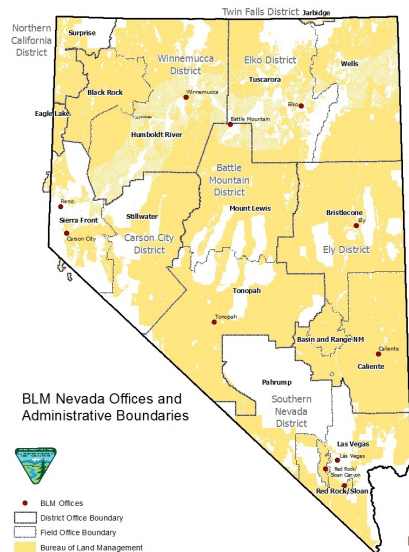


Figure 2: A map depicting the land in Nevada that is administered by the BLM. This does not depict all land that is administered by the Federal Government, but it depicts a vast majority of it. (Bureau of Land Management)¹³

The prevalence of federal land in Nevada makes public lands policy very significant to the renewable energy industry. To start, shifts in power at the federal level can drastically change policy priorities and affect developers' ability to develop new renewable energy generation projects.¹⁴ This hampers the ability of the state to enact its own renewable energy goals.

Political Dynamics, Narrative Landscape and Public Opinion

Nevada has long been a purple state, and currently has a Republican Governor and a Democratic majority in both the State Assembly and Senate.¹⁵ Traditionally, the urban center of Clark County has been a Democratic stronghold with Washoe County being the only swing county in the state.¹⁶ In recent elections, Clark County has grown more competitive as the number of independent voters has drastically grown. The rest of Nevada has a long history of learning more conservative than its urban cores.

Nevertheless, politicians, advocates, and utilities largely agree on supporting large-scale renewable development, though not always. Elected politicians and government agencies often frame renewable deployment as an economic opportunity to lead the nation in clean energy development, create good-paying jobs, and reduce costs to consumers while supporting GHG reduction goals.¹⁷ The most recent gubernatorial election in 2022 did not feature renewable energy prominently, though that is not always the case.¹⁸

Assemblyman Howard Watts (D - Las Vegas), the current chair of the Assembly Committee on Growth and Infrastructure, has been an outspoken advocate for renewable energy within the state.¹⁹ While some politicians call for a full transition, like Senator Jacky Rosen (D), others take a more restrained approach, like current Governor Joe Lombardo (R).²⁰ His 2023

executive order called for the state to “develop and employ electric projects to be a leader in clean energy development through abundant renewable energy sources,” while also deeming it necessary to use and develop all available energy and storage resources, including natural gas, to achieve a “balanced energy portfolio.”²¹ Critics view this as a step back from the state’s ambitious carbon reduction goals.²²

Public opinion overwhelmingly favors greater renewable energy development, illustrated by Nevada voters' approval for stronger renewable investment via a referendum in 2018 and 2020 to increase the Renewable Portfolio Requirements (See Climate Policy).²³ The Priority Climate Plan’s community engagement efforts demonstrate a sophisticated public understanding of the issue. Those engaged emphasized energy storage, modernizing the grid, and improving electric infrastructure and equitable access for low-income communities. They also noted the different energy profiles across state geography, pointing to the importance of appropriately tailoring projects and policy.²⁴ Polling by advocacy organizations in the last four years also affirms public support across party and regional lines, with voters again noting the importance of reducing costs and creating jobs and calling for more government action to increase solar adoption.^{25, 26} One recent poll found that voters are largely receptive to having utility-scale solar built in their communities, with 79% of urban, 65% of suburban, and 66% of rural voters agreeing a project would have their support.²⁷

Academic research on public opinion is sparser but reveals a nuance to the debate. In 2014, Smith et al. found that tribal members and rural ranchers and farmers support solar at 67% and 69% respectively, yet only 60% of ranchers and farmers believe human activity is playing a significant role in climate change. Nevertheless, all parties were willing to take action to reduce their own energy use if it saved money despite a minority supporting other climate policies like taxing fossil fuels (see figure 3).²⁸ Peterson and Feldman found in 2018 that Nevada residents prioritized improving environmental quality, reducing energy costs, and creating renewable energy jobs when considering the most important energy policy outcomes.²⁹

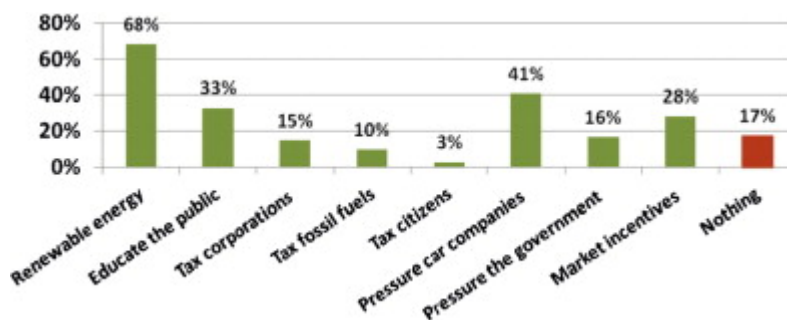


Figure 3: Ranchers and farmers’ climate policy preferences. (Smith, et al.)³⁰

Public opposition has often focused on possible environmental degradation. Inside Climate News reported some environmentalists in the state saw the rise of the renewables industry to be a threat to the American West and the as-yet undeveloped public lands that define the state.³¹ NPR cited concerns for wildlife and fears that any benefits will flow out of state, a talking point used by Senator Rosen’s opponent in their most recent election campaign.^{32, 33}

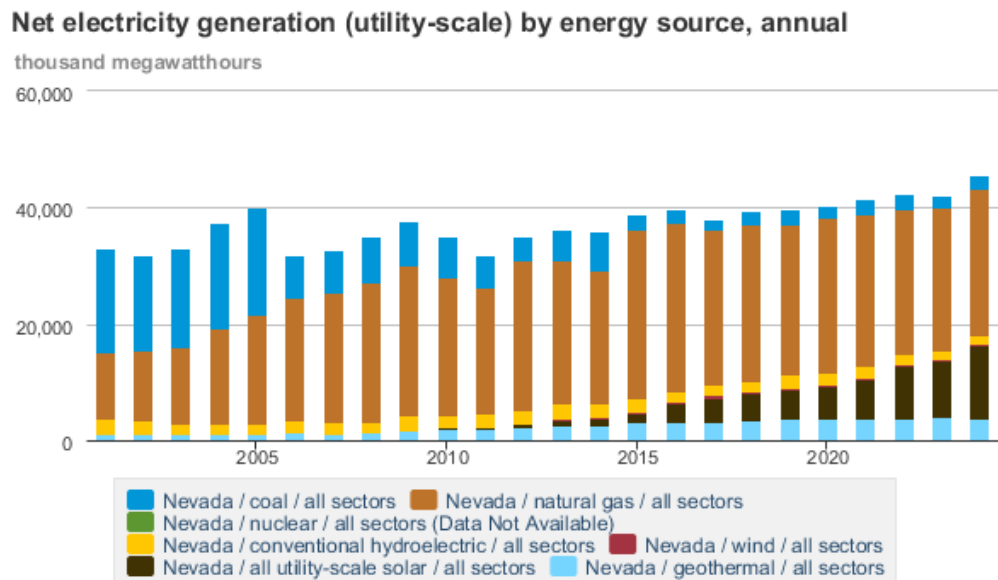
Electricity System

Current Electricity Mix

In 2024, Nevada's electricity mix was dominated by natural gas and an increasing share of renewables. Eight of the state's ten largest power plants run on natural gas, accounting for 53% of electricity generation.³⁴ Renewable sources made up 43% of Nevada's electricity generation, with solar contributing 31%, geothermal 8%, and hydroelectric power 3% (95% of which came from the Hoover Dam). The remaining 1% of Nevada's renewable generation was made up of wind and biomass. Coal accounted for 5% of generation.

Recent Trends

Nevada has undergone a dramatic energy transition over the past 25 years, phasing out coal and increasing natural gas and renewable generation (see Figure 4). From 2001 to 2024, coal generation dropped from 17,737 to 2,323 GWh (an 87% decrease), natural gas generation grew from 11,513 to 25,006 GWh (a 117% increase), geothermal rose from 2,000 to 3,848 GWh (a 92% increase), and solar jumped from 1,013 GWh in 2014 to 12,479 GWh in 2024 (a 1,132% increase).



Form EIA-923, Power Plant Operations Report

Figure 4: A stacked bar chart displaying Nevada's electricity generation between the years 2001-2024. Total electricity generation is shown in terms of thousands of megawatt hours. Sources shown are coal, natural gas, hydroelectric, wind, solar, and geothermal. (EIA)³⁵

The dramatic decrease in coal generation started with the full retirement of the Reid Gardner Station in 2017, which generated 557 MW at its peak.^{36,37} In 2023, it was transformed into a 220 MW / 440 MWh battery energy and storage system.³⁸ Another coal-fired plant, the 567 MW North Valmy Station, is planned to be converted into a natural gas plant by 2026, with 411 MW of additional capacity in the form of two peaker plants to be added by 2028.^{39, 40} The 242 MW TS Power Plant was converted into a natural gas and 200 MW solar facility, with potential geothermal accommodations.^{41, 42}

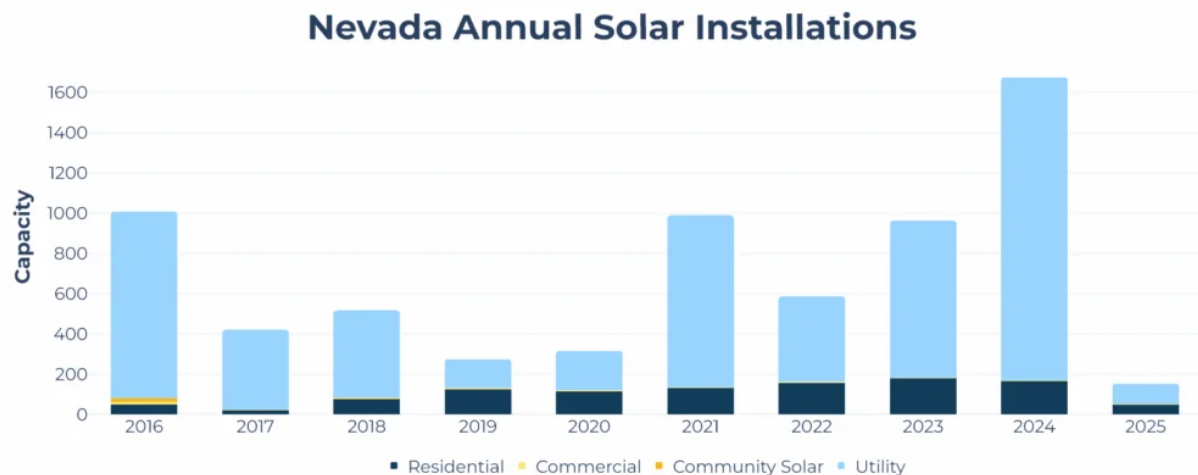


Figure 5: A stacked bar chart displaying Nevada’s annual solar installations from the years 2016-2025 Q1. Total electricity generation is shown in terms of megawatts. Installations shown are residential, commercial, community solar, and utility. (EIA)⁴³

Nevada has rapidly developed solar since 2008 especially in the southern part of the state (see Figure 5). NV Energy has more than two dozen solar sites paired with battery storage and plans to build more than 1,000 MW in new capacity by the end of 2027.^{44, 45} The largest solar project in Nevada as of 2024, the Gemini Project, generates 690 MW of energy, enough to power approximately 10% of Nevada at peak demand.⁴⁶

Nevada is the second largest producer of geothermal energy in the U.S, home to 26 plants, primarily in the north, with a combined nameplate capacity of 827 MW.⁴⁷ The largest is the 162 MW McGinness Hills project.⁴⁸

Wind power has lagged in Nevada’s transition. Despite decent wind potential, only one utility-scale wind farm (150 MW at Spring Valley) exists, built in 2012.⁴⁹

In the near future, Nevada - especially Reno - is expected to be one of the fastest growing data center hubs in the US, with total data center capacity expected to grow 3,800 MW, or 953% higher than current capacity.⁵⁰ While many of these investments are led by large technology firms with renewable energy commitments, the resulting load growth will have significant implications for grid planning, transmission, and resource selection.

Transmission

Until the launch of the One Nevada transmission line in 2014, Nevada’s north and south electricity systems weren’t linked.⁵¹ The addition of this transmission enables solar power from the south to reach load centers in the north. The Greenlink transmission project will enable Nevada to build two new links, see Figure 6 (a). The first, Greenlink West, is a 350-mile link between North Las Vegas and Yerington (~50 miles southeast of Reno) expected to be in service by May 2027.⁵² The second is Greenlink North, a 235-mile line connecting Ely in the northeast to Yerington. However, these plans have faced delay since the 2024 presidential election.^{53, 54}

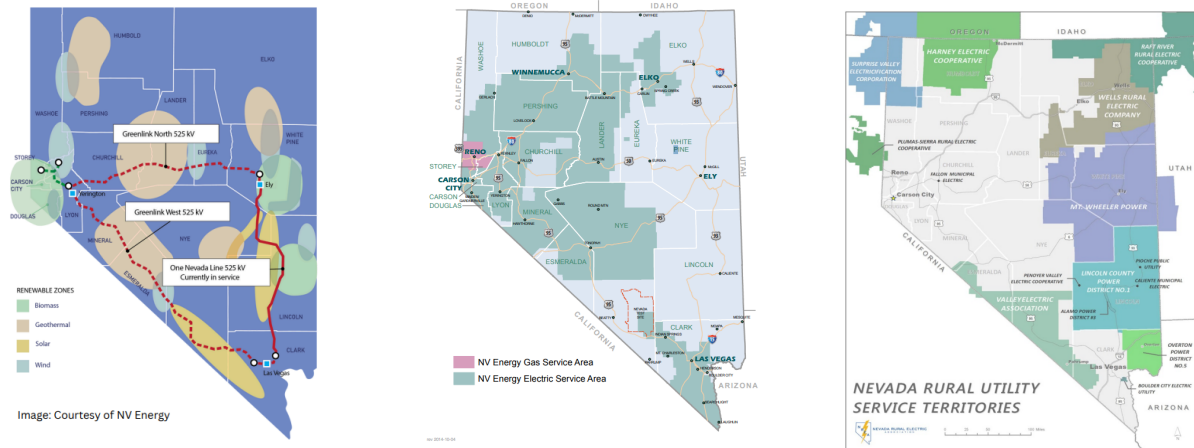


Figure 6: (a) A map overlaying the completed One Nevada and proposed Greenlink transmission lines (NV Energy); (b) A map overlaying NV Energy's service areas (Nevada Governor's Office of Energy); and (c) A map overlaying cooperatives, public power, and municipal utilities. (Nevada Rural Electric Association)

Imports and Exports

Nevada has no commercial coal deposits, natural gas reserves, or nuclear plants, and has limited crude oil production, making the state historically dependent on imported fossil fuels.⁵⁵ In 2023, Nevada consumed 689 trillion Btu, while only producing 66 trillion Btu.⁵⁶ However, electricity trade patterns have evolved in recent years, see Figure 7. In the early 2000s, Nevada was a net electricity exporter, during a period in which coal-fired generation was the state's primary generation source. As the state grew in the early 2000s, electricity demand outpaced generation, shifting the state to a net importer. More recently, expanded development of geothermal, solar, and energy storage have shifted the state towards a balanced electricity system, in part due to solar driven exports to California during peaks of high generation.⁵⁷

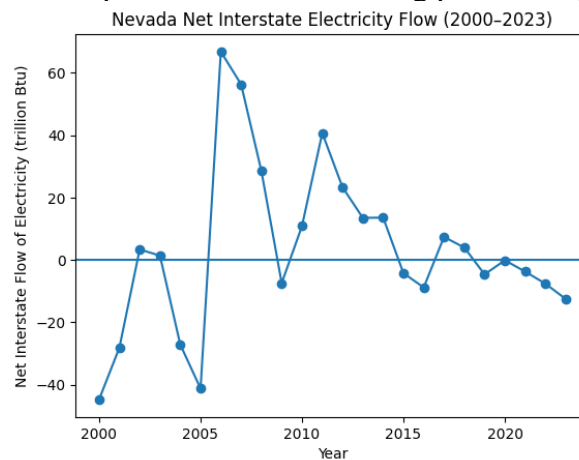


Figure 7: A scatterplot showing Nevada's Net Interstate Electricity Flow from the years 2000-2023 (in trillions Btu). Nevada has typically been a net importer of electricity, but that trend has been changing in recent years.⁵⁸

Electricity Sector Structure

The major electricity provider in Nevada is the investor-owned utility NV Energy, a subsidiary of Berkshire Hathaway.⁵⁹ It supplies electricity for 1.4 million customers.⁶⁰ NV Energy operates through two regulated subsidiaries: Nevada Power Company in Southern Nevada and Sierra Pacific Power Company in Northern Nevada, see Figure 6 (b).⁶¹ Nevada is also home to six rural cooperatives, three public power utilities, and one municipal utility, represented by the Nevada Rural Electric Association, see Figure 6 (c). In total, these providers serve over 126,000 customers in rural Nevada.^{62, 63}

Nevada's investor-owned utilities are regulated by the Public Utilities Commission of Nevada (PUCN). In addition to establishing rates and energy procurement strategies, the PUCN is also responsible for overseeing electricity provider's compliance with Renewable Portfolio Standards.^{64, 65}

Renewable Energy Potential & Land Use

Nevada has high renewable energy potential. Based on SLOPE estimates of annual technical potential Nevada has the capacity to annually produce the following:⁶⁶

1. 10 billion MWh from concentrating solar
2. 6.26 billion MWh from utility PV
3. 1.05 billion MWh from onshore wind
4. 54.3 million MWh from utility geothermal

In 2024, Nevada consumed 40.66 million MWh⁶⁷, which is orders of magnitude smaller than the total technical potential of renewable energy within the state. It is clear that Nevada could theoretically meet 100% of its demand with in-state renewable resources.

Nevada has the nation's highest solar power potential. Nearly every county falls within the highest category of technical potential, see Figure 8.

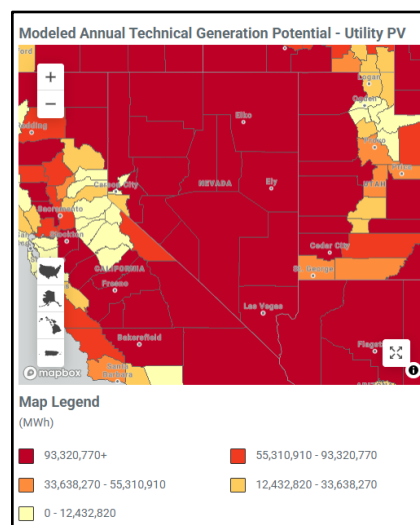


Figure 8: Annual technical generation potential for utility-scale solar PV at the county level. (NREL)⁶⁸

Nevada also possesses some exceptional geothermal resources clustered in the northwest, with the greatest geothermal resources in the entire nation, see Figure 9.⁶⁹ Recent discoveries of

“blind” potential - resources without surface thermal indicators - have further expanded estimates of development, reflecting Nevada’s location in the geologically active Great Basin.⁷⁰

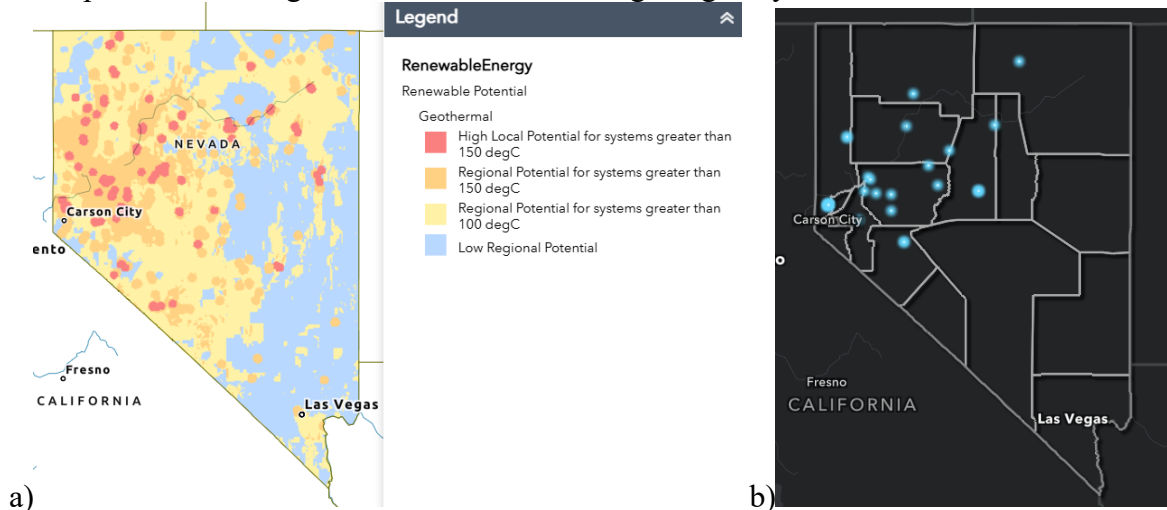


Figure 9: a) Distribution of geothermal generation potential across Nevada. b) Geothermal power plants in Nevada⁷¹

High speed winds are found along the ridges of Nevada's mountainous landscape. The highest wind power classes are concentrated in the interior, far from the major cities and existing transmission infrastructure. However, moderate wind resources are found all across Nevada. SLOPE indicates that all Nevada counties have the highest level of total wind power potential, see Figure 10. Despite the relatively high potential for wind power, there has been little development. Nevada’s preference for geothermal over wind likely stems from the distinct advantages of geothermal development, including lower land requirements, firm baseload generation, and reduced community backlash. Community acceptance of wind is discussed in greater detail in the siting section.

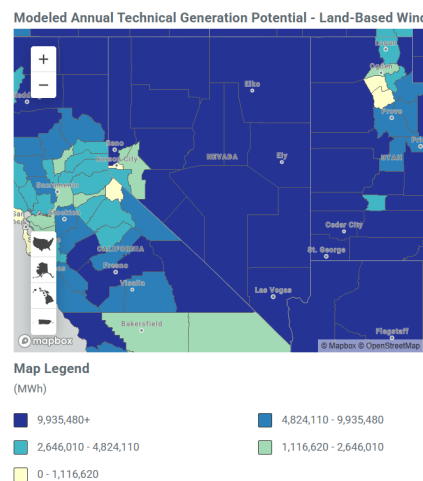


Figure 10: Wind power. Annual technical generation potential at the county level. (NREL)⁷²

Existing Energy Research

State

A considerable body of research and planning has been produced on Nevada's energy potential, policies, and their impacts. The Governor's Office of Energy annually releases a "Status of Energy" report, reviewing key grants and programs and positioning them within broader energy goals like diversification, reliability, efficiency, and workforce development.⁷³ The multi-agency Energy Markets Planning (E-MAP) Roadmap is a comprehensive review of goals and achievements across the state's electric system.^{74, 75} The state's Priority Climate Action Plan, published under then-Governor Sisolak in early 2024, outlined a plan for how to align the state's energy sector and major energy uses with its ambitious climate goals.⁷⁶ However, the document was taken offline within the first few months of current Governor Joe Lombardo taking office and replaced with Governor Lombardo's scaled down "Climate Innovation Plan."⁷⁷ The new plan has faced significant criticism for its "all-of-the-above approach" to energy generation and for failing to provide a realistic emissions reduction strategy.⁷⁸

Academic Research

Academic institutions and scholars research both policy impacts and environmental impacts, like the 2013-2018 work of the Nevada Solar-Energy-Water-Environment Nexus Project. The University of Nevada's Center for Energy Research conducts a great deal of research on energy issues, but generally from a technological perspective unspecific to the state. The Center for New Energy Economy out of Colorado State University released a policy and sector brief on Nevada back in 2019 and maintains an updated gap analysis through their State Policy Opportunity Tracker (SPOT) tool.^{79, 80} The University of Pennsylvania's Kleinman Center for Energy Policy's April 2022 report "Net-Zero Nevada: From Pledge to Action" uses Nevada as a case study to demonstrate four pathways to reach a state's net-zero targets.⁸¹

Peer-reviewed papers and academic theses have been published on a variety of other topics as well. Rezaee et al. found the new RPS's could improve health outcomes, but not equitably.⁸² Rountree offered an assessment of regulatory success, describing the state's approach to strengthening the standards as "unaggressive," with regulatory capture undermining policy design and leaving customer choice as the key driver behind the growth of in-state renewables.⁸³ The effects of federal and state incentives on residential solar adoption were examined by Farhidi, who found state-level rebates dramatically reduced upfront costs while federal invest tax credits had little positive and possibly negative impacts.⁸⁴ Another study found the state's gross receipts tax helps it capture greater revenues than an income tax, though it increases wind generation's cost, potentially deterring development.⁸⁵

NGOs

Non-governmental organizations take broader approaches to research while occasionally focusing on unique opportunities in the state. The American Council for Energy Efficient Economies gives Nevada's energy efficiency a score of 37.5/50, but data are dated. A 2021 update mentions no specific measures to prioritize clean energy workforce development, though that effort is now frequently celebrated.⁸⁶ Climate Power more recently published "Nevada Clean Energy Plan Benefits," aggregating information on how federal funding on clean energy

benefited the state with a substantial investment boost, clean energy job creation, and consumer cost savings.⁸⁷ Rocky Mountain Institute (RMI) and Energy Innovation LLC collaborated on statewide Energy Policy Simulators, which they used to argue that implementing strong climate-friendly policies can transition Nevada to a low-carbon economy and produce thousands of new jobs and hundreds of million dollars of economic growth.⁸⁸ The Nature Conservancy (TNC) and RMI also used research to advocate for transitioning brownfield sites like mines into solar facilities. They position Nevada as a potential leader with enough convertible land to provide more than 20 times the capacity required to meet the current RPS, see Figure 11.⁸⁹

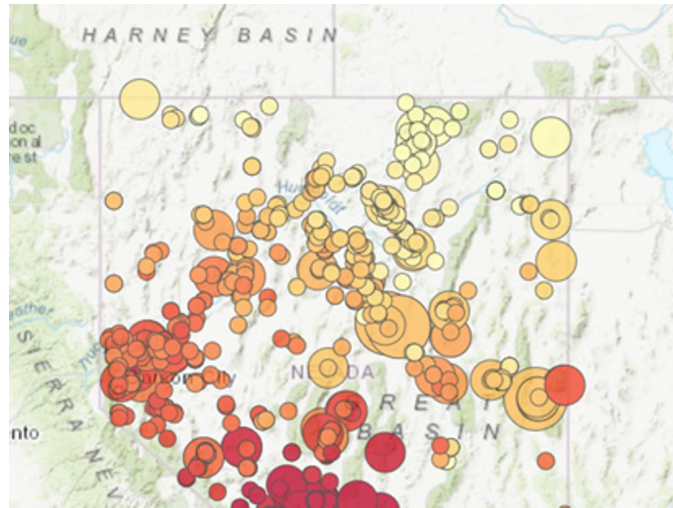


Figure 11: TNC's Mining the Sun map tool, demonstrating brownfields' renewable energy potential. (The Nature Conservancy)⁹⁰

Policy Landscape

Climate Policy

Nevada has a long history of explicit climate policy. Its renewable portfolio standard, enacted in 1997 (AB 366)⁹¹ and codified into law through Nevada Revised Statutes 704.7801-704.7828,⁹² is one of the oldest, highest, and most successful in terms of compliance in the country.⁹³ The state's largest utility, NV Energy, claims to have exceeded targets for more than a decade,⁹⁴ though the standard applies to all state electricity providers, regardless of whether they are otherwise subject to regulation by the PUCN.⁹⁵ The standard was initially nominal, starting at two-tenths of one percent of the total electricity consumed⁹⁶ and rising to 1.2% by 2010,⁹⁷ though it has been modified nearly every legislative session since it was passed, see Appendix Table 1.⁹⁸ In 2019, Senate Bill 358 again increased the percentage, this time to a binding 50% standard by 2030.⁹⁹ The 2019 law went beyond setting a standard, declaring in three provisions that it is the policy of the state to:

- encourage and accelerate renewable development;
- become a leading producer and consumer of renewable energy;
- ensure any benefits of the increased use of portfolio energy systems and energy efficiency measures are received by the Nevada residents. Benefits include improved air

quality, reduced water use, diversified electricity generation portfolio, reduced fossil fuel consumption and more stable rates for electricity retail customers

Additionally, they added a non-binding 100% carbon-free goal by 2050¹⁰⁰ and expanded who qualifies as a provider with compliance obligations, including cooperatives, non-profit corporations, and associations.¹⁰¹ Failure to comply with the standard for two years in a row, or for any year 2030 or thereafter, may result in an administrative fine and/or other administrative actions, as determined by the PUCN.¹⁰² The amount is to be not less than the difference between “the just and reasonable” average cost per kWh to acquire or save electricity “pursuant to renewable energy contracts or energy efficiency contracts and the overall average cost” incurred by utilities to generate, acquire, and save electricity.¹⁰³ The same binding target from SB 358 was enshrined in the state constitution via an independent referendum (Nevada Question 6, of 2018 and 2020).^{104,105} In 2017, Assemblyman Chris Brooks introduced AB 206, which would have increased the RPS to 80% by 2040, but that target was reduced to less than the current RPS through amendments and the bill was ultimately vetoed by the Governor.¹⁰⁶

The RPS system is built on what the state calls Portfolio Energy Credits (PECs), a certain number of which are required to be reported for compliance.¹⁰⁷ Any kWh that a provider generates, acquires, or saves from a portfolio energy system (and before 2025, from an efficiency measure) would count as one credit. Only bundled PECs can be traded.¹⁰⁸ The RPS statute has or has had several other features and specifications, including carve-outs and multipliers, see Table 1 below. Firstly, it excludes nuclear in its definition of renewable energy.¹⁰⁹ The statute also qualifies that the total amount of electricity sold does not include a provider’s first 1 million MWh.¹¹⁰

Subject	Multiplier	Notes
Solar	2.4 kWh/kWh	Counts only for solar photovoltaic systems installed before 2016
Customer-maintained distributed renewable system	1.05 kWh/kWh	
Tire facilities	0.7 kWh/kWh	For facilities utilizing reverse polymerization if the system is installed on the premises of a retail customer and 50% of electricity generation is used by the customer on-site

Table 1: PEC multipliers.¹¹¹

Several design elements of Nevada’s RPS expired or were fully retired in 2025. Until then, energy efficiency measures could also be used to comply with the RPS up to 10% of the total, of which 50% must have come from energy efficiency measures installed at residential customer service locations. A 1.05 kWh/kWh multiplier for energy efficiency savings was also in effect, though the PUCN is permitted to adopt regulations that could reinstate a multiplier for peak load savings. A 6% carve-out for solar, starting in 2016, expired in 2025 as well.¹¹²

There is fairly strong public and private support for the RPS, with the 2018 and 2020 referenda increasing the standard to 50% by 2030, passing by 59%¹¹³ and 58%¹¹⁴ respectively. However, support is not evenly distributed: only Washoe and Clark Counties, home to the Reno and Las Vegas metropolitan areas, respectively, saw more than 50% approval in 2020. Every other county voted no.¹¹⁵ These large population centers may be driving state-wide polling, too:

polling from 2019 found 74% of Nevadans supported setting a goal of 100% renewable electricity generation by 2045, with support from 92% of Democrats and 54% of Republicans.¹¹⁶

Interviews with stakeholders published that same year reveal a more nuanced picture of the RPS. They described the early RPS as a “well-intentioned” and integral policy in Nevada’s renewable development history but criticize changes they see as weakening its ability to achieve its policy objectives. They were most concerned, though not universally, with frequent modifications, the allowance of existing resources to count towards targets, the pre-2015 solar multiplier, flexibility mechanisms like the ability to purchase and bank out-of-state RECs, the allowance of credits for energy used to operate geothermal facilities, and the energy efficiency allowances. The academic literature describes some of these policy design features as weakening the stringency of a given RPS, which is associated with less in-state renewable deployment. There is evidence supporting these stakeholder concerns; Rountree claims that “much of the electricity used to meet RPS targets has come from Idaho and Wyoming,” states without their own RPS requirements. The degree to which the RPS has been effective over time at increasing installed capacity over what would have occurred without the RPS has therefore been called into question.¹¹⁷ At the very least, it is possible it delocalized benefits.

There has also been concern about NV Energy’s reporting and ability to meet standards. NV Energy executives have noted that meeting the 2030 standard will “be a challenge” due to increasing costs. However, in 2023, one claimed that “there’s going to be a lot of investment in the next five to 10 years to meet the RPS.”¹¹⁸ As previously mentioned, NV Energy has reported exceeding the threshold of 34% by 2024, claiming that in 2024, 47% of electricity sold came from renewable sources. However, the state Consumer Advocate argued in a PUCN filing that the utility inflated numbers, arguing that the battery storage station usage and solar multipliers are “loopholes” because they do not result in a reduction of carbon emissions. They claimed that without these loopholes, only 29% of NV Energy’s came from renewables in 2024, leaving them out of compliance with the 34% requirement.¹¹⁹ But, the state found them to be in compliance and the intervention was withdrawn.¹²⁰ Stakeholders reported concerns around the relationship between the PUCN and NV Energy, calling it “cozy.” They critiqued the PUCN’s 2009 decision to allow for the purchasing and banking of out-of-state RECs, a decision made possible by the use of vague language in the policy design.¹²¹

Beyond the RPS, legislators passed SB 123 in 2013, placing specific portfolio requirements on NV Energy. First, NV Energy was required to retire 800 MW of coal-fired electric generating plants by 2020. They were concurrently required to purchase, construct, or acquire 900 additional MW of capacity, of which 350 MW must come from renewable energy facilities, to offset capacity losses. The policy design included a phase-out of the coal plants and a phase-in of the new generating capacity, with a specific December 2021 construction deadline for the final 50 MW of renewable capacity. This 50 MW generating capacity must be owned and operated by the utility itself.¹²²

Energy efficiency resource standards (EERS) exist for each utility but are not “binding” in the same way they are in other states. Under Nevada Revised Statute 704.7836, the PUCN is obligated to establish utility-specific “goals for energy savings resulting from energy efficiency programs” which are to be included as part of the utility’s filed resource plan. However, the PUCN is permitted to lower those goals temporarily should the utility petition that “economic reasons” would prevent the utility from meeting them.¹²³ However, the law does not seem to create an enforcement mechanism. In 2021, SB 382 was introduced to the Committee on Growth and Infrastructure and would have required goals for energy efficiency programs to yield no less

than 1.3 percent savings multiplied by the number of years covered by the resource plan. However, it was never discussed on the floor.¹²⁴ Aside from the goals, the energy efficiency plans are required to focus at least 10% of efficiency program expenditures on low-income households and residential customers, and public schools in historically underserved communities. Programs offering variable incentive levels are also obligated to offer larger incentives for low-income households.¹²⁵ Additionally, the Office of Energy adopts the International Energy Conservation Code, which sets energy efficiency standards for new buildings. Local governments are permitted to adopt more stringent standards, according to NRS 701.220.¹²⁶

There are no carbon pricing programs in the State, though then-Governor Sisolak's Executive Order 2019-22 explicitly called for his administration to identify and evaluate "comprehensive economy-wide or sector-specific programs to reduce carbon dioxide and other greenhouse gas pollution across Nevada, including market-based mechanisms that may be appropriate for Nevada's greenhouse gas emissions profile."¹²⁷ His Climate Action Plan, which was taken offline by his successor, even more explicitly discussed carbon pricing, arguing "there are opportunities for Nevada to generate resources to support climate action by pricing carbon."^{128, 129} Several pages of the plan are dedicated to exploring cap-and-trade and carbon taxes. While it did not call for anything specific, the sections end by stating, "it is critical to establish a framework (e.g., CGEP, 2019) that will identify the policies that dovetail with and bolster an appropriate carbon price solution."¹³⁰ Reporting from 2019 suggested that it is "likely that the state will explore implementing a cap-and-trade program that links with the Western Climate Initiative," though we found nothing additional to suggest this is the case.¹³¹

With the election of Governor Lombardo in 2022, Nevada's political landscape has undergone significant shifts, undermining earlier momentum around state-level climate policy. Before then, in 2019, the state legislature passed Senate Bill 254,¹³² setting forth economy-wide GHG reduction goals of 28% below 2005 levels by 2025; 45% by 2030; and zero or near-zero by 2050.¹³³ The following year, in April 2020, the Nevada Department of Conservation and Natural Resources (NDCNR) announced Dr. Kristen Averyt as Nevada's first State Climate Policy Coordinator, though the position was eliminated.¹³⁴ As previously mentioned, since entering office, Governor Lombardo axed the Priority Climate Plan, pulled out of the U.S. Climate Alliance,¹³⁵ and sought to centralize economic development and ongoing natural gas use as part of the state's energy policy objectives.¹³⁶ In August 2024, Governor Lombardo released his "Climate Innovation Plan," replacing the Nevada Division of Environmental Protection's Priority Climate Action Plan, submitted earlier in 2024.¹³⁷ However, there has been much criticism of the Governor's plan, including that it "functionally ignores" carbon emissions as it fails to acknowledge the state's explicit emission reduction goals. Alexandra Phillips, an assistant professor in environmental communication at University of California, Santa Barbara, told one paper, "[Nevadans] have a great landscape in the clean energy transition, and this is not a document produced by a state leading this transition."¹³⁸

Public Utilities Commission Policy

The Public Utilities Commission of Nevada (PUCN) is the state regulatory agency that oversees investor-owned utilities within the state. Their basic regulatory duties include:

- fair and impartial regulation of public utilities;

- ensure the safe, economic, efficient, prudent, and reliable operation and service of public utilities;
- provide public utilities with the opportunity to earn a fair return on their investments;
- and provide customers with just and reasonable rates.¹³⁹

On top of these basic regulatory duties, the PUCN is also authorized to develop renewable energy resources within Nevada and promote energy conservation.¹⁴⁰

As such, the PUCN evaluates the investor-owned utilities' long and short-term plans for generation and transmission for compliance with the state of Nevada's RPS and issues permits for the construction of utility facilities. Under Nevada law, any person, other than a local government, constructing a utility facility in Nevada must obtain a Utility Environmental Protection Act (UEPA) permit from the PUCN.¹⁴¹ These facilities include all conventional power plants (e.g., natural gas, oil, coal, nuclear), renewable energy projects (including geothermal) with an output greater than 70 MW, and above-ground transmission greater than 200 kV. The PUCN also has to approve any Power Purchasing Agreements (PPAs) between NV Energy and any energy generation facility with a PUCN-approved UEPA permit.¹⁴² Renewable energy projects handled through a PPA with NV Energy typically allow NV Energy a lower rate of return, than if the project was managed by the utility directly.

Before granting approval, the PUCN evaluates whether proposed facilities are necessary for system reliability, pass environmental review, will serve the public interest, and that all required federal, state, and local permits are secured or in progress. Under state law, the PUCN must grant or delay an application within 150 days of filing, or 120 days when a federal environmental review applies.)

However, since around 85% of Nevada's land is administered by the federal government, there is often an additional layer of authority that can supersede the PUCN. Any project that is fully or partially on federal land must obtain appropriate approval and permits from the administering federal agency. This federal agency is typically the regional BLM office as it administers the majority of public lands in Nevada (See [Public Lands](#) section for more). The federal government does not play a long-term role in the construction, management, or operation of renewable energy projects. NV Energy and the PUCN still serve as the primary actors and regulators of the renewable energy or transmission project.

Recently, the PUCN has seen its regulatory powers expand. Under SB448, passed in the 2021 Legislative Session, the PUCN will require every transmission provider in Nevada to join a regional transmission organization (RTO) by 2030.¹⁴³ Currently commissioners at the PUCN, representatives from utility companies and consumer advocate agencies, and multiple local elected officials are a part of the Regional Transmission Coordination Task Force to study the benefits of Nevada joining a RTO. The task force is still ongoing as of this writing, but in their most recent report, released in early 2025, the Task Force recommended that NV Energy join a day-ahead market and appear to be looking at the California Independent System Operator (CAISO) and the Southwest Power Pool (SPP). NV Energy has stated that they will file an application to join CAISO's Extended Day-Ahead Market (EDAM).¹⁴⁴

Though little is known about the next steps for NV Energy, joining CAISO's EDAM would potentially require new legislation from the Nevada State Government in order to accommodate for changing regulatory powers. In addition, if Nevada were to join CAISO, the PUCN would need to implement and follow any FERC orders relating to the transmission grid. Currently, Nevada is already a participant in CAISO's Western Energy Imbalance Market, so a transition into an RTO may not be terribly drastic.¹⁴⁵

Tax Policy

Nevada's tax policies have been a huge driver of the state's success in developing renewables over the past 15 years. The primary driver of this transition is the Renewable Energy Tax Abatement (RETA) Program, established in 2009 and administered by the Governor's Office of Energy. RETA provides partial property tax and sales/use tax abatements to qualifying utility-scale solar, biomass, geothermal, and wind projects, significantly reducing upfront capital and long-term operating costs for developers.¹⁴⁶ Eligible projects receive a 55% property tax abatement for 20 years and a sales/use tax reduction to 2.6% (compared to the typical rate of 6.85% - 8.375%).^{147, 148} To be eligible for incentives, projects must meet stringent workforce, investment, and operational requirements, including:¹⁴⁹

- Plan to be operational for 10+ years
- Nameplate capacity of at least 10 MW
- 50% of employees must be Nevada residents
- If sited in a county of at least 100,000 or a city with a population of at least 60,000, there must be 75 full-time construction employees and \$10,000,000 capital investment in Nevada
- If sited in a county with population no more than 100,000 or a city with population no more than 60,000, there must be 50 full-time construction employees and \$3,000,000 capital investment in Nevada
- Pay construction workers 175% of the average Nevada hourly wage (excluding management and administrative employees)
- Provide health insurance through a third-party administrator, including dependents

In 2021, S.B. 448 expanded RETA to include property tax abatements for energy storage systems paired with renewables, recognizing the importance of pairing renewables with storage to enhance grid stability.¹⁵⁰ As of 2024, RETA has supported 68 projects generating 7,465 MW of renewable capacity, providing over 17,000 construction jobs, 700 operational jobs, capital investments exceeding \$14 billion, and abated \$1.2 billion in property and sales/use tax.¹⁵¹ Most of Nevada's largest utility-scale projects have benefitted from RETA. Of the 84 utility-scale renewables projects listed in Nevada's 2024 Status of Energy Report (See Appendix Table 2), 51 are identified as RETA participants.

Nevada counties fund their budgets through a mix of property and sales/use taxes, state redistributions, mining revenues, and federal Payments in Lieu of Taxes (PILTs, annual payments intended to compensate local governments for the presence of untaxable federal land). This matters for RETA because the benefits of renewable projects depend on what kind of land the project is sited on. Projects built on private or municipal land can still generate meaningful long-term revenue for local governments, since counties retain the remaining 45 percent of property tax value, in addition to the sales/use tax. Clark County's 690 MW Gemini Solar Project illustrates this, as it received \$121 million in abatements, but invested over \$1 billion in Nevada while creating 422 construction jobs and six operational jobs.¹⁵² Another example is Boulder City, which leases city-owned land for multiple projects. As a result, energy production leases account for 33-39% of their total revenue.¹⁵³

By contrast, in some counties where almost all of the land is federally owned, RETA is contentious - most land is not subject to local property taxation, yet RETA limits the tax base on the small amount of private land that remains. One resident from Esmeralda County, where 97% of the land is federally owned put it this way: "The state hands out those lollipops called tax abatements, and if they do it with these solar projects, the county gets squat."¹⁵⁴ While these

counties receive federal PILTs, and collect sales/use taxes on renewable energy equipment on federal land, these revenues do not replace foregone property taxes from large-scale energy facilities. A 2009 study of RETA estimated that a typical 100 MW solar facility would generate an estimated \$18.5 million in property tax revenue and \$6.4 million in sales/use taxes over its first 15 years in absence of abatements, validating local concerns that RETA limits long-term property tax revenue.¹⁵⁵

Nevada has largely kept RETA unchanged since its conception. In addition to the state's renewable potential, developers value the stability and bipartisanship of the incentives.

Siting Authority

Siting authority determines where and how energy projects are approved. In Nevada, this authority depends on project scale and land ownership: PUCN oversees approval of large-scale utility generation (>70 MW), local governments retain control over zoning and land-use decisions, and federal agencies oversee development on federally owned lands.¹⁵⁶

While local governments control zoning and land-use decisions, this authority is constrained by state law, which prohibits local governments from adopting ordinances that “unreasonably restrict” renewable development.¹⁵⁷ While there are instances of developers withdrawing applications due to community opposition, no major court cases have risen to test whether a county denial could be overturned under the “unreasonable restriction” standard. Local zoning authority is also limited because many large projects are sited on federal land.

Local governments engage with federal agencies through the Nevada State Clearinghouse, which collects and compiles official comments from local governments. SLUPAC (the Nevada State Land Use Planning Advisory Council), a Governor-appointed council under the Nevada Department of Conservation and Natural Resources, also engages with federal agencies like BLM.¹⁵⁸ It has representatives from all 17 counties, the Nevada League of Cities and Municipalities, and the Nevada Indian Commission. It provides official comments on BLM actions like rulemaking and individual project permitting.

Due to the large amount of federal land in Nevada, federal approval frequently becomes a decisive factor for renewable projects. Projects on federal land require review under the National Environmental Policy Act (NEPA), administered by the BLM. While NEPA review serves as the primary environmental review, PUCN approval and state permits are only granted after the federal environmental assessment is completed. These federal reviews include environmental assessments, tribal consultations, and public engagement, and have at times been a blocker for renewables in Nevada. For example, even after BLM approval in 2013, the Searchlight wind farm was ultimately cancelled in 2017 when a federal judge invalidated permits due to environmental concerns.¹⁵⁹ In 2025, the permitting process for the Esmeralda 7 solar project was restarted and subjected to additional review.¹⁶⁰ These projects demonstrate the importance of federal approvals in developing renewable projects in Nevada.

Public Lands

The Bureau of Land Management, under the Department of the Interior (DOI), controls 47.8 million acres of Nevada's land.¹⁶¹ The mission of the BLM, established by the Federal Land Policy and Management Act (FLPMA) of 1976, is to manage America's public lands for ‘multiple uses’ and ‘sustained yields’, while conserving their natural, historical and cultural

resources now and for future generations.¹⁶² Solar, wind, transmission and other renewable energy projects are permitted as rights of way (ROW)—a ROW is permission to use a specific area of land for a specific period of time, generally for allowing public-interest infrastructure. The BLM carries out project-specific NEPA reviews for individual proposed projects as part of permitting.¹⁶³

Resource Management Plans

BLM carries out land use planning, as required by the FLPMA, to balance resource values and multiple land uses using ‘physical, biological, economic and other sciences’.¹⁶⁴ Resource Management Plans (RMPs) are long-term plans (10-20 years) that form the basis of the BLM’s land and resource management. All development on BLM lands must be consistent with the applicable RMP or amend the RMP to allow the project.¹⁶⁵ Developing an RMP requires developing the plan itself and an Environmental Impact Statement. The process includes multiple rounds of public engagement. The RMP must address conflicts with existing state and local plans. Finally, the RMP is approved by the BLM state director.¹⁶⁶

Individual BLM districts have their own RMPs, and Nevada has 12 RMPs currently in effect. Many are out of date, as the average age of Nevada’s RMPs is 22 and some were last updated in the 1980s. Therefore, to the significant changes in land uses, technologies, and policies since their last updates, BLM Nevada began a statewide RMP Modernization Project.¹⁶⁷ Revising the plans in an integrated manner (with a single RMP and EIS) would be efficient, provide state-wide consistency, and allow planning at the landscape or eco-region scale. SLUPAC supported BLM Nevada’s RMP Modernization undertaking.¹⁶⁸ BLM Nevada presented the preliminary concept for the Nevada-wide revision in July 2021, intending to complete the RMP revision in October 2025.¹⁶⁹ However, no updates could be found since 2022 and the project’s webpage on the BLM website is no longer accessible, so it may have stalled or been cancelled.¹⁷⁰

Western Solar Plan

To expedite solar energy projects on public lands, the BLM developed the Western Solar Plan (WSP) in 2012. It was an overarching plan for utility-scale solar generation on BLM lands in six Western states (Arizona, California, Colorado, Nevada, New Mexico, and Utah), amending RMPs across the covered states. It classified BLM land into Solar Energy Zones (preferred for solar development), variance areas, and exclusion areas. It specified rules for permitting on SEZs and variance areas.¹⁷¹

In response to President Biden’s Executive Order ‘Tackling the Climate Crisis at Home and Abroad’ (which directed the Secretary of Interior to streamline permitting to increase renewables production) and the Energy Act of 2020 (which set a permitting target of 25 GW of renewable energy production on public lands by 2025), BLM undertook an update of the 2012 WSP, publishing the finalized plan in December 2024.¹⁷² The 2024 WSP covers 11 states (adding Idaho, Montana, Oregon, Washington, and Wyoming to the original six). It changed the land classifications to open, avoidance and exclusion areas. Open lands in the 2024 WSP are either close to a transmission line or are already disturbed lands.

Appendix Table 3 describes the different land classifications under the 2012 WSP and updated 2024 WSP and enumerates the extent of each. The 2024 Western Solar Plan received praise from environmental and conservation groups for prioritizing previously disturbed lands for solar development.¹⁷³

One such case where the streamlined planning process supported renewable development is the Gemini Solar Project. Permitting was completed in under three years because the BLM conducted extensive pre-application site screening and deconfliction to identify sensitive habitats, cultural sites, and competing land uses before the formal application was filed. This early analysis, combined with developer partnership with the Moapa Band of Paiute Indians, helped balance environmental, cultural, and economic considerations while expediting approval.¹⁷⁴ The BLM has permitted five solar projects in Nevada since 2021 and offered competitive lease sales for two parcels in Nevada's Amargosa SEZ, with 11 projects in review as of 17 January 2025.¹⁷⁵

There is no information on the Trump administration's intent to roll back the 2024 Updated Western Solar Plan. So far, the BLM Solar website has not been updated with information on the 2024 Plan, with information from the 2012 Plan still up.¹⁷⁶ Since the plan took two years and changing it would require the same lengthy process, it's possible that the administration is using different approaches to advance its energy policy priorities, such as the OBBBA's phase-out of renewable energy tax credits and cancellation of discounted capacity fees (see Analysis section).

Renewable Energy Rule

BLM is generally required to charge rent or fees set to the fair market value of the land use. Developers pay the greater of an acreage rent (based on project area) or capacity fee (based on generation capacity). The Energy Act of 2020 authorized the BLM to reduce capacity fees and rents below market rate to promote renewables. The BLM implemented this through guidance in 2022. They codified further reductions in the 2024 Renewable Energy Rule, which discounted capacity fees by 80% until 2035 (stepping down to 20% by 2038). It established additional incentives of 20% reductions for using Project Labor Agreements or domestic materials.¹⁷⁷

The Rule changed the capacity fee to be based on actual production of electricity rather than the maximum theoretical production or nameplate capacity. The capacity fee is determined based on prevailing wholesale prices or the price received by the developer under a PPA. The acreage rent is calculated by applying the rate schedule (based on National Agricultural Statistics Service data) to the acreage of the ROW. Rates are assessed and fixed at the time of project authorization, and adjusted annually at a predetermined rate, improving predictability for developers.¹⁷⁸

SLUPAC commented on the Renewable Energy Rule on behalf of local governments, promoting a Smart from the Start approach that supports conservation, stressing the importance of local benefits and expressing concern about proposed changes to public meetings.¹⁷⁹

Apart from the Renewable Energy Rule, the Public Lands Rule recognized conservation and ecosystem health as being on an equal footing with other uses, moving away from the BLM's prior extractive focus.¹⁸⁰ The rule expanded the use of land health standards, established restoration and mitigation leases and allowed the BLM to prioritize the protection of Areas of Critical Environmental Concern.¹⁸¹

Changes with New Administration

The BLM announced its intention to rescind the Renewable Energy Rule and eliminate capacity fee discounts in May 2025.¹⁸² That specific rescission process became redundant with the passage of the OBBBA in July 2025, which established a new acreage rent and capacity fee

formula for solar and wind energy on public lands and functionally overruled the Renewable Energy Rule's discounts.¹⁸³ The Department of Interior also published its proposal to rescind the Public Lands Rule.¹⁸⁴

The Department of Interior announced in a July 15 memo that all actions concerning wind and solar energy facilities will undergo elevated review by the Office of the Secretary. They shall require submission to the Office of the Executive Secretariat and Regulatory Affairs, subsequent review by the Office of the Deputy Secretary, and final review by the Office of the Secretary.¹⁸⁵ Such a stringent and opaque process is likely designed to block renewable energy projects or delay them beyond the tax credit eligibility window.¹⁸⁶ Nevada Democratic Senators and Representatives wrote a letter to the Secretary opposing the memo and noting that 'not a single wind or solar project in any state had received approval under the new guidance'.¹⁸⁷ Reflecting the bipartisan support for renewable energy in Nevada, Governor Joe Lombardo, a Republican, also wrote a letter to the Secretary criticizing that the memo had frozen renewable energy development in Nevada.¹⁸⁸

The Secretary of Interior also released a secretarial order on August 1st directing BLM to consider energy density and capacity density when reviewing energy projects. This tips the scales further against wind and solar energy, which take up more land and have lower capacity factors than fossil generation.¹⁸⁹

The BLM cancelled the environmental review of the massive 6.2 GW Esmeralda-7 project, a combined project being developed by six companies.¹⁹⁰ Bureau officials said that the individual projects are free to submit applications separately. Given the lengthy application process and the roadblocks increasingly being put up by the Trump administration, this will likely add years to the timeline or stall them entirely. The Solar Energy Industry Association says that these changes jeopardize the solar boom in the West, with 94% of planned new capacity in Nevada under threat.¹⁹¹

The administration has also released multiple actions against wind energy—a January 20, 2025, memorandum froze wind leasing and permitting on public lands, pending completion of a "comprehensive review of Federal wind leasing and permitting practices." This review has yet to occur and wind permitting remains frozen.¹⁹² The Secretary of the Interior announced four policy measures against renewables on July 29—ending 'preferential treatment' for wind, terminating designated offshore Wind Energy Areas, enhancing stakeholder consultations for offshore wind, and reviewing consequences of wind turbines on migratory birds to impose penalties.¹⁹³

Geothermal energy is included in an executive order to accelerate permitting of data center infrastructure.¹⁹⁴ The Department of Interior has taken action to support and accelerate geothermal development, by fast-tracking review of projects on public land.¹⁹⁵

Infrastructure Investment

When it comes to direct investment in renewable energy infrastructure by the state, there is little to discuss. Nevada offers little funding for its renewable energy infrastructure, except for some financial assistance programs for rooftop and distributive solar.¹⁹⁶ As such, the state spends most of its time directing renewable energy developers to federal programs. These funding sources are managed through the Nevada Clean Energy Fund (NCEF), which is an independent non-profit created by the state of Nevada in 2017 as a part of SB 407, to assist in the financing of renewable energy projects in the state.¹⁹⁷ Most of the funding offered by the NCEF is earmarked for small-scale projects like rooftop and community solar and home energy efficiency

improvements. However, in 2025 SB 132 gave the NCEF \$500,000 with the express purpose of “securing and implementing grants for qualified clean energy projects,” which includes providing bridge or gap funding for qualified clean energy projects.¹⁹⁸

Besides the NCEF, Nevada funds renewable energy development through the Temporary Renewable Energy Development (TRED) Program. Created through the passage of AB 3 in 2005, TRED is used to help facilitate the development of renewable projects in the state.¹⁹⁹ The program is funded through an additional charge on NV Energy customers' bills. Using the revenue, NV Energy created an independent trust “to assure payment for the costs of renewable energy to developers who had approved contracts to sell electricity to NV Energy and were having trouble getting financing to build their renewable generating plants.”²⁰⁰

In addition, the Bipartisan Infrastructure Law gives states funding to improve the resilience of their electric grids through the Grid Resilience Formula Grant Program.²⁰¹ The current funding cycle for the program is ongoing, so it is unclear how much Nevada has been allocated for the 2025 fiscal year. In the 2024 and 2022-23 funding cycles, Nevada was awarded around \$7.5 million and \$10.5 million, respectively. Most recently, these funds have been used by the Nevada Rural Electric Association to modernize rural power systems and infrastructure and by NV Energy to improve vegetation management and repair aging electric infrastructure in disadvantaged communities.

Currently, Nevada has no statewide transmission plan.²⁰² Thus, the integrated resource plans submitted by NV Energy serve as the primary planning documents for the state of Nevada’s transmission infrastructure. Moreover, since there is no statewide transmission plan and because Nevada is a regulated utility market, the main funding source for statewide transmission projects are NV Energy ratepayers.²⁰³

The largest single investment in the state’s transmission infrastructure in the state has been NV Energy’s Greenlink Transmission Line Project. The PUCN has already given their approval for the project, but the utility is waiting for final approval from the BLM for the northern portion of the project.²⁰⁴ A large portion of Greenlink’s \$4.2 billion cost will be footed by Southern Nevada electric customers through their newly-added daily demand charge.²⁰⁵

Analysis

Nevada has made meaningful progress in deploying renewable energy over the past decade, but its true potential remains untapped. At times, state and federal climate policy and incentives have worked in tandem to accelerate renewable development, but recent changes in federal and state leadership, regulatory loopholes, and the dependencies created by the large proportion of federal lands have limited the state’s ability to reach its full renewable capacity. Despite strong tax abatements, renewable energy development in the state appears largely driven by market forces and federal permitting allowances. In addition, growing energy demand (partly driven by data centers) is mounting even more pressure on the state’s efforts to increase reliability, keep energy rates down, and reach its ambitious RPS goals. This analysis argues that Nevada’s path forward to meeting these goals requires a state-driven strategy to take advantage of resources on federal lands, pairing northern geothermal and southern solar and energy storage with rooftop and distributed solar under shifting federal policy. The effectiveness of this strategy depends on Nevada’s ability to strengthen state climate policy, align utility incentives with climate outcomes, manage federal permitting risks, and increase the benefits of utility-scale projects for local communities.

While state climate policy has inarguably positively impacted renewable development in the state to some degree, the inconsistent political landscape and current state administration's "all-of-the-above" approach have slowed Nevada's momentum towards becoming a true climate leader. With the scrapping of the Priority Climate Plan, Nevada lacks a data-driven strategy to meet its emission reduction goals, nor does it appear committed to doing so with its current Governor doubling down on natural gas. Reinstating the Priority Climate Plan or implementing other reduction guidance could provide state actors with more clarity or a path to follow. If the state aims to reduce emissions statewide, consistent and coordinated cross-industry planning could support a stable environment that would accelerate deployment of renewable energy.

The efficacy of Nevada's RPS is hindered by loopholes for battery storage powered by non-renewables and controversial accounting mechanisms allowing the grid to appear clean before it actually is. Additionally, while current solar developments have largely been sufficient for the state to meet its RPS goals, future demand for data center load growth is shifting new development towards natural gas. Rather than acquiring solar to meet this growing demand, NV Energy is increasing the development of natural gas facilities while purchasing out-of-state clean energy to comply with the RPS.

This strategy by NV Energy may accelerate in coming years as the Trump Administration has grown increasingly hostile to renewable energy projects on federal land. This potentially poses a challenge for Nevada as a vast majority of renewable energy in various stages of development are on federal land, in some capacity.²⁰⁶ NV Energy has even (unsuccessfully) petitioned FERC to allow renewable energy developers to drop their undeveloped and risky projects from the interconnection queue without any associated fees or penalties.²⁰⁷ This reveals an opportunity to strengthen the RSP standard by reducing incentives that lead to continued dirty fuel use, like the conversion of the Valmy coal plant to another fossil fuel plant rather than a renewable or storage facility.²⁰⁸

The continued growth of natural gas development is also driven by incentives in PUCN rate structure allowing for greater return on self-developed projects. While the self-developed solar project Sierra Solar demonstrates the utility's interest in building solar, the clean generation capacity may have been brought online faster and at a better cost to ratepayers had it been acquired through a PPA or more strategic planning.²⁰⁹ Should the PUCN like to see more solar in NV Energy's mix, they could increase the rate of return on solar PPAs to make them commensurate with self-developed projects.

In the face of federal permitting challenges, the state could increase multipliers for distributed generation, solar and wind in order to incentivize development that could help meet their RPS goals. That could push developers and utilities to seek out opportunities to develop on private land and make use of generous tax abatements. The expiration of solar carveouts may also reduce efforts to meet the RPS with solar, so the state may consider extending those carveouts as well.

Another mechanism that could help align Nevada's clean energy goals with projected load growth—without burdening ratepayers—is the use of clean transition tariffs. These utility tariffs allow large electricity customers to procure new, dedicated clean energy resources through the utility, with costs borne by participating customers rather than spread across the broader rate base. This structure enables utilities to serve growing demand from energy-intensive users, such as data centers, without defaulting to new natural gas capacity or increasing residential rates. In Nevada, clean transition tariffs could allow NV Energy to facilitate firm, carbon-free generation by enabling large customers to contract for resources such as geothermal, mirroring

arrangements like Google's partnership with Fervo Energy to supply geothermal power to data centers. If adopted or encouraged by the PUCN, clean transition tariffs could better align NV Energy's procurement decisions with the state's decarbonization goals while preserving grid reliability and ratepayer protections.²¹⁰

Another promising pathway for Nevada's clean energy future is geothermal energy. Despite the Trump administration's current hardline against renewable energy development on federal land, geothermal is not counted amongst the renewable energy technologies the administration is seeking to slow down.²¹¹ The Trump administration appears to be supportive of the technology and has even preserved many of the tax credits created for it in the Inflation Reduction Act, while cutting tax credits for other renewables like wind and solar.²¹² The Department of Interior has also fast-tracked the review of geothermal energy.²¹³ And, as outlined earlier in this report, Nevada has enormous geothermal potential and is already the second-highest geothermal power producer in the country.²¹⁴ Unlike other renewables, geothermal provides firm, baseload power. This makes it well suited to support emerging electricity demands from data centers. The Google and Fervo partnership to provide geothermal power to data centers demonstrates how the market values reliable, carbon-free energy. Nevada can capitalize on this opportunity by fostering an environment friendly to geothermal developers working on next-generation technologies, such as enhanced geothermal, closed-loop, and advanced drilling systems.

Further expansion of geothermal could help Nevada meet its Renewable Portfolio Standard goals while maintaining relatively low electricity rates. However, the state's recent hands-off approach to renewable development means progress will likely depend on federal policy and private-sector initiative unless there are meaningful changes to PUCN authority or state funding mechanisms. At the same time, southern Nevada remains well positioned for continued solar deployment, particularly when paired with energy storage to meet peak demand or export excess generation to California. Yet because much of both northern geothermal and southern solar development occurs on federal land, Nevada's clean-energy trajectory remains vulnerable to shifts in federal permitting and land-use policy. Increasing tax abatements for geothermal or creating multipliers or carveouts for geothermal may induce further geothermal development.

Another possibility for Nevada is to deepen its ties with its neighbors by fully committing to an RTO. Currently the state is actively investigating the benefits of joining either CAISO or SPP, with NV Energy already applying to participate in CAISO's EDAM. Joining either RTO could substantially improve the long-term transmission and renewable energy development plans for the state. Greater regional planning could offset the costs of large-scale infrastructure projects, increase renewable energy reliability, and increase the chance that Nevada will meet its RPS and climate goals.²¹⁵ However, there are still significant political and legal hurdles for Nevada if/when they join an RTO.²¹⁶ Namely that western states are hesitant to relinquish their state's sovereignty over their energy grid, especially if they believe that they are relinquishing control of it to California. In a deeply purple state like Nevada, such a proposition could be politically toxic. In addition, western states with vertically integrated utilities like Nevada, may find additional pressure from their incumbent investor-owned utilities who wish to maintain their monopoly power.

Finally, beyond job creation, Nevada can strengthen community acceptance of renewable projects by linking projects to tangible, place-based benefits. One promising pathway is prioritizing development on brownfields, as 2.8 million acres of brownfield sites in Nevada are

suitable for renewable energy deployment.²¹⁷ Current estimates state that solar alone on these sites could generate capacity equivalent to more than 2,300 percent of the state's current RPS requirement. Many of these brownfield sites are former mines and are near rural communities that are struggling to find a new economic base. Redeveloping the land for renewable energy could be an economic lifesaver. This plan also aligns with the 2024 Western Solar Plan, reduces land-use conflicts, and minimizes ecological footprint—thus improving the long-term perception of renewable development.

Should Nevada seek to expand on its clean energy potential, they could re-implement a greenhouse gas reduction strategy, double-down on geothermal incentives, pair solar with energy storage, and leverage federal land access when possible. By tapping into its unique renewable resource potential, Nevada has the ability to convert its energy constraints into competitive advantage and become the leading state in renewable energy generation.

Appendix

Table 1 - Major legislative modifications to Nevada's Renewable Portfolio Standard and credits^{218, 219}

Year of Major Legislation	Law Number	Target Set	Carveouts & Allowances Set	Multipliers Introduced
1997	AB 366	1.2% by 2010	50% of target (0.6% of sales)	
2001	SB 372	15% by 2013	5% of target, 1% of all electricity sales, from solar	
2003	AB 296			2.4 kWh credit/kWh for solar if systems installed on retail customer premises .7 kWh credits/tires generated through reverse polymerization
2005	AB 03	20% by 2015	Energy efficiency credits allowed: up to 10% of total target each year, 50% of which must come from measures installed at residential service locations	
2009	SB 353	25% by 2025	6% of target, 1.5% of all electricity sales beginning in 2016	
2013	SB 252	25% by 2025, and revised qualifications for eligible systems	Removed energy efficiency allowance through complete phaseout by 2025	End solar multiplier for systems installed after 2015
2019	SB 358	50% by 2030 Non-binding 100% carbon reduction goal by 2050	Modified waterpower eligibility	
2018, 2020	Referendum 6 (constitutional amendment)	50% by 2030 (slower pace than SB 358)		

Table 2 - Renewable Energy Projects in Nevada

SOLAR			
POWER PLANT NAME	capacity (MW)	POWER PLANT NAME	capacity (MW)
Apex Solar (Southern Power)*	20	Nevada Gold Energy*	300
Arrow Canyon Solar *	200	Nevada Solar One (Acciona Solar)	75.7
Battle Mountain (Con Edison)*	101	Nevada Valley Solar Solutions*	13.5
Boulder Solar (Southern Power)*	100	Patua Acquisition Project, LLC	10.6
Boulder Solar II (AEP Renewables)*	50	Playa Solar (I & II) (EDF Renewables)*	179
CM 10 (Con Edison)	10	River Mountains Solar	14.4
CM 48 (Con Edison)	58	Searchlight Solar (Altus Power)*	17.5
Copper Mountain 2-5 (Con Edison)*	754.6	Silver State Solar North*	52
Crescent Dunes (Tonopah Solar)*	125	Silver State Solar South*	260.1
Dignity - San Martin (MN8 Energy)	1.7	SoCore Energy (TJX Las Vegas)	1
Dignity - Siena Campus (MN8 Energy)	1.4	Solar Las Vegas MB (1 & 2) (NRG)	6.4
Dodge Flat Solar*	200	Spectrum Solar (Southern Power)*	30.2
Dry Lake Solar*	150	Steamboat Hills (Ormat)	2
Eagle Shadow Mountain*	300	Stillwater (EGP)*	20
Fish Springs Solar*	100	Stillwater (Enel)*	22
Ft. Churchill (Sierra Pacific Power)	19.9	Sunshine Valley Solar (EDP)*	103.5
Galena 2 (Ormat)	3	Techren Solar (I-V)*	400
Gemini Solar*	690	Tesla Reno GigaFactory	6.7
Greenbacker Renewable Energy (IGS LAS1 & VGT)	2	Townsite Solar*	180
Harry Allen Solar (AEP Renewables)*	100	Tungsten Mountain	12.3
IKEA Las Vegas (IKEA)	1	Turquoise Liberty Solar (Liberty Utilities)*	10
Las Vegas WPCF (City of Las Vegas)	3.3	Turquoise Nevada (Greenbacker)*	60
Luning Energy (Liberty Utilities)*	50	Western 102 (NGM)	1
Moapa Southern Paiute (Arevon)*	250	Yellow Pine Solar 1*	125
Mountain View (NextEra)*	20		
Nellis AFB (Solar Star NAFB)*	13.2		
Nellis Solar (Nevada Power)*	15		
GEOTHERMAL			
Beowawe Power (Ormat)*	20.6	Richard Burdette (Ormat)	30
Blue Mountain (NGP)	63.9	Salt Wells (Enel)*	23.6
Brady (Ormat)*	21.5	San Emidio (USG Nevada)	11.8
Desert Peak (Ormat)	26	Soda Lake 3 (AMOR IX)*	26
Dixie Meadows*	14.3	Star Peak Geothermal	21.9
Dixie Valley (Ormat)*	70.9	Steamboat (II & III)	36.4
Don A. Campbell (I & II) (ORNI 47, 37)*	47.5	Steamboat Hills (I, II, & III) (Ormat)*	31.6
Galena II and III (Ormat)	43.5	Stillwater (ENEL)*	47.2
Jersey Valley (Ormat)*	23.5	Tungsten Mountain*	62.5
McGinness Hills (I & III) (Ormat)*	202.8	Tuscarora (Ormat)*	32
North Valley (Ormat)*	37	Whitegrass (Open Mtn Energy)	6.4
Patua Acquisition Project*	48		
HYDROELECTRIC			
Fleish (TMWA)	2.5	New Lahontan (TCID)	4
Hoover Dam (Nevada allocation)	1,039.40	Verdi (TMWA)	2.4
Lahontan (TCID)	1.8	Washoe (TMWA)	2.6
BIOMASS			
Republic Services Renewable Energy*	12	Waste Management Lockwood	3.2
WIND		WASTE HEAT	
Spring Valley Wind*	150	Goodsprings Waste Heat Recovery (Nevada Power)	7.5

*Indicates participation in GOE's Renewable Energy Tax Abatement (RETA) Program

Source: EIA 2019 Form 860, Schedule 3; RETA Program Data

Table 3 - Different land classifications under the 2012 WSP and updated 2024 WSP

Land Classification	Area in full plan	Area in Nevada	Description
2012 WSP²²⁰			
Solar Energy Zones (SEZ)	285,000 acres	60,395 acres (5 SEZs)	- Well suited and prioritized for utility-scale solar development - Used a competitive bidding and leasing procedure for issuing solar leases, incentives for development
Variance Areas	19.2 million acres	9,076,145 acres	- Non-SEZ areas but not otherwise excluded from development - Applications for development followed a case-by-case ‘non-competitive’ process
Exclusion areas	-	-	Lands excluded from solar energy development
2024 WSP²²¹			
Open lands	32 million acres combined	8.85 million acres	- Available for solar project proposals - Either within 15 miles of a transmission line (existing or planned) or previously disturbed land (regardless of distance from transmission)
Avoidance lands		3 million acres	- Sensitive lands with important functions - Available for solar project proposals if the project demonstrates that it wouldn’t disturb functions
Exclusion areas	-	35.4 million acres	Lands with a slope of more than 10% (up from the 2012 plan’s limit of 5%), or which have significant resource conflicts—like Areas of Critical Environmental Concern, important wildlife habitat (e.g., sage-grouse habitat), or lands containing culturally significant resources

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