BEFORE THE NEVADA ENERGY DIRECTOR
GOVERNOR'S OFFICE OF ENERGY

In the Matter of the Application of:)
) Application Filing No. 26-0806SPV
Southern Bighorn II Solar Energy and Battery Project)

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

A hearing was held before the Director of the Governor's Office of Energy (Office) on October 28, 2026, regarding Application Filing Number 26-0806SPV. At the hearing, applicant 425LM 8ME LLC was represented by John Redlingshafer from 425LM 8ME LLC. Based upon the Southern Bighorn II Solar Energy and Battery Project application, and evidence presented at the hearing, the Director makes the following findings of fact, conclusions of law, and order in this matter.

FINDINGS OF FACT

1. At the hearing of the matter, 425LM 8ME LLC presented the testimony of John Redlingshafer. The Office Director admitted into evidence a packet of Exhibits that contained six subparts: (1) Notice of Public Hearing dated, September 25, 2026 (2) Southern Bighorn II Solar Energy and Battery Project Application as filed with the Office on August 6, 2026 (3) Fiscal Impact of the partial abatement of Property Tax as required by NRS 701A.375-1 by the Nevada Department of Taxation, received on September 8, 2026; (4) Fiscal Impact of the partial abatement of Sales and Use Tax as required by NRS 701A.375-1 by the Nevada Department of Taxation, received on August 7, 2026 (5) Fiscal Impact of the partial abatement as provided by the Governor's Office of Finance required by NRS 701A.375-1, received on September

3, 2026; (6) Pre-filed Testimony of John Redlingshafer. At the hearing, all Exhibits were admitted into evidence.

Based upon the testimony of the witness and the evidence presented, the Director finds the following to be the facts in this matter.

2. 425LM 8ME LLC is a company with a current Nevada State Business License from the Nevada Secretary of State.

3. On August 6, 2026, 425LM 8ME LLC submitted its application seeking partial abatement of sales and use taxes and property taxes for the construction and operation of a Facility for the generation of solar photovoltaic and energy storage ("Facility") that would be located in Clark County, Nevada ("Facility") that would be located in Clark County, Nevada. County Assessor's Parcel Numbers 06700001012 ,06700001019, 06800001007, 06800001013, 06800001008, 06800001014, 067-00-001-012, 018 & 019, 043-00-002-004, 005, 009, 010, 014, 015, 068-00-001-001, 002 & 007, 042-07-000-004 ("Parcel"). The Application described a 100 MW solar photovoltaic facility coupled with a 100 MW 4-hour batter energy storage system.

4. The filed application supported that 425LM 8ME LLC was properly licensed and qualified to do business in Nevada; that 425LM 8ME LLC, had obtained all required discretionary state and local licenses and permits, with the remaining permits to be obtained prior to start of construction, expected sometime during 4th Quarter of 2026, and intended to maintain all of the required licenses and permits for the Facility; that 425LM 8ME LLC had all necessary approvals for the Facility; that the Facility would have an AC nameplate rating of up to 100 MW AC; that the Facility was anticipated to be at least partially operational sometime during 3rd Quarter of 2028; that the total capital investment of the Facility in Nevada will be approximately $335,337,878.00; that the Facility would create approximately 10 full-time operational jobs which would pay an average of approximately $49.04 per hour; and that the Facility would

create an estimated 150 full-time construction jobs over the course of construction which would pay an average hourly wage of $57.51 per hour.

5. That the average hourly wage that will be paid by the Facility to its employees in this State, excluding management and administrative employees, is approximately $49.04, which is at least 110% of the average statewide hourly wage for green industry tax abatements, currently posted by Department of Employment Training and Rehabilitation.

6. That the average hourly wage paid by the Facility to all its construction employees working on the Facility, excluding management and administrative employees, will be approximately $57.51, which is at least 175% of the average statewide hourly wage for green industry tax abatements, currently posted by Department of Employment Training and Rehabilitation.

7. The Fiscal Impact statement produced by the Department of Taxation shows the following estimated figures regarding the sales and uses taxes related to the Facility:

Total Amount Abated (Year 1)	$62,857.03
Total Amount Abated (Year 2)	$55,790.32
Total Amount Abated (Years 3)	$0.00
TOTAL AMOUNT ABATED	**$118,647.36**
Total Amount Abated by Local Government (Year 1)	$118,642.65
Total Amount Abated by Local Government (Year 2)	$105,304.24
Total Amount Abated by Local Government (Year 3)	$0.00
TOTAL AMOUNT ABATED BY LOCAL GOVERNMENT	**$223,946.89**
TOTAL LOCAL SCHOOL SUPPORT TAX GAIN	**$154,241.57**

8. The Fiscal Impact statement produced by the Department of Taxation shows the following estimated figures regarding the property taxes related to the Facility over the abatement period (20 years):

Total Property Taxes Due Before Abatement	$54,246,237.00
Total Property Taxes Abated Over Abatement Period	$29,835,430.00
Total Taxes to Local Government Over Abatement Period	$24,410,807.00

9. The Fiscal Note produced by the Budget Division shows that the State General Fund will be impacted for a total of approximately $4,563,360.00 abated over the period of the abatement (2026 through 2029).

10. Synthesizing the figures in evidence in this matter, the total estimated benefit pursuant to NRS 701A.365(1)(f) to the state and local governments in Nevada is $335,337,878.00 and the total estimated amount of property taxes and sales and use taxes abated in this matter is $42,285,299.60. Thus, the benefits to the state and local governments in Nevada exceed the total amount of abated taxes. The estimated benefits and amounts abated over the applicable periods of abatement are calculated as follows:

Financial Benefits

Capital Investment in Nevada	$335,337,878.00
Construction Payroll in Nevada residents	$8,626,500.00
Operational Payroll in Nevada:	$19,380,608.00
TOTAL BENEFITS OVER ABATEMENT PERIODS	**$363,344,986.00**

Amounts Abated

Total Sales and Use Taxes Abated (3 Years)	$221,405.60
Total Property Taxes Abated (20 Years)	$42,063,894.00
TOTAL TAXES ABATED	**$42,703,202.67**

11. That all the evidence discussed in the preceding paragraphs was supported by the substantial, reliable, and probative evidence taken from the record produced at the hearing of this matter.

CONCLUSIONS OF LAW

1. The Director has the jurisdiction and authority to adjudicate this matter because the Application is within the scope of NRS 701A.300 through 701A.390 and the Director is required by law to hold the hearing in this matter pursuant to NRS 701A.360(5).

2. The substantial, reliable, and probative evidence in the record of this matter shows that the 425LM 8ME LLC application for the construction and operation of the Facility satisfies the following statutory requisites:

(a) NRS 701A.320(1)(a) – The primary source of energy to operate the Facility will be the Facility itself, thus meeting the statutory standard.

(b) NRS 701A.320(1)(b) – The Facility will generate 100 MW AC Nameplate, thus exceeding the statutory standard.

(c) NRS 701A.320(2) – The Facility is not located on residential property, thus meeting the statutory standard.

(d) NRS 701A.360(2) – The Facility is not owned, operated, leased, or controlled by a government agency, thus meeting the statutory standard.

(e) NRS 701A.365(1)(a)(1) – The Facility is anticipated to be operational for at least 10 years, thus exceeding the statutory standard.

(f) NRS 701A.365(1)(b) – The Facility has all the necessary state and local permits and licenses to operate, thus meeting the statutory standard.

(g) NRS 701A.365(1)(c) - No funding for the Facility is or will be provided by any governmental entity in this State for the acquisition, design, or construction of the Facility or for

the acquisition of any land therefore, except any private activity bonds as defined in 26 U.S.C. §141, thus meeting the statutory standard.

(h) NRS 701A.365(1)(d)(1) – The construction of the Facility will employ at least 150 full-time employees during the second quarter of construction. 425LM 8ME LLC anticipates that at least 50% of those employees will be Nevada residents, thus meeting the statutory standard.

(i) NRS 701A.365(1)(d)(2) – The capital investment in Nevada for the Facility is estimated to be at least $335,337,878.00, thus exceeding the statutory standard.

(j) NRS 701A.365(1)(d)(3) – The average hourly wage paid to the operational employees of the Facility will be approximately $49.04, which is at least 110% of the average hourly wage set by DETR of $32.86, thus meeting the statutory standard.

(k) NRS 701A.365(1)(d)(4) – The average hourly wage paid to the construction employees on the Facility will be approximately $57.51, which is at least 175% of the average hourly wage set by DETR of $32.86, thus meeting the statutory standard.

(l) NRS 701A.365(1)(d)(4)(I) and (II) – The health insurance provided to the construction employees on the Facility was represented to allow for the coverage of the dependents of the employees and will meet or exceed the standards established by the Director, thus meeting the statutory standard.

(m) NRS 701A.365(1)(f) – The benefits that will result to this State from the employment by the Facility of the residents of this State and from capital investments by the Facility in this State exceeds the loss of tax revenue that will result from the abatement, thus meeting the statutory standard.

(n) NRS 701A.370(1)(a)(3) – The abatement granted by this Order will not apply during any period in which the Facility is receiving another abatement or exemption from property taxes

imposed pursuant to chapter 361 of NRS, other than any partial abatement provided pursuant to NRS 361.4722, thus meeting the statutory standard.

(o) NRS 701A.370(1)(b)(1)(III) – The abatement granted by this Order will not apply during any period in which the Facility is receiving another abatement or exemption from local sales and use taxes, thus meeting the requirement of the statute.

ORDER

Based upon the foregoing, the Director orders that 425LM 8ME LLC application Filing No. 26-0806SPV related to the construction and operation of the Facility is hereby **GRANTED.** 425LM 8ME LLC and the Director may execute an Abatement Agreement as soon as practicable that will satisfy the requisites of NRS 701A.300 through NRS 701A.390. 425LM 8ME LLC sales and use tax abatement will terminate three years from the effective date of the Abatement Agreement. 425LM 8ME LLC real property tax abatement, which applies to the Parcels, and 425LM 8ME LLC personal property tax abatement will terminate 20 years from the effective date of the Abatement Agreement.

SIGNED this 4 day of Novemb, 2026.

James Humm

James Humm
Director
Governor's Office of Energy

Final Order_Southern Bighorn II Solar Energy and Battery Project

Final Audit Report 2026-11-04

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