

September 17, 2025

Trevor Lloyd, Planning Manager
Community Services
Washoe County
1001 E. Ninth Street, Bldg. A
Reno, NV 89512

Re: Request for Extension of Time for Special Use Permit WSUP21-0001

Dear Trevor,

CED Rock Springs Solar, LLC (Applicant), a fully owned subsidiary of RWE Renewables Americas, LLC, respectfully requests an extension of Special Use Permit WSUP21-0001 for the Rock Springs Solar Project, from its current expiration date of April 2026 by an additional two (2) years, to April 2028. This extension aligns with a pending two-year compliance extension for the Project's Utility Environmental Protection Act (UEPA) permit (PUCN Docket 20-12032, motion to extend to March 2028) and is necessary to accommodate unforeseen delays in project development, as detailed below.

No changes are proposed to the Project's scope, site plan, capacity (120 MW photovoltaic solar generation with 120 MW battery energy storage system), grading (627 acres of disturbance with balanced cut/fill of approximately 426,000 cubic yards), variances (height, landscaping, parking), or other approved elements. Already reviewed and approved as a project of regional significance by the Regional Planning Commission on December 6, 2021, the requested extension—which solely extends the permit duration without altering substantive aspects of the approval—does not trigger new regional review.

Despite diligent efforts, the Project has encountered significant delays beyond the Applicant's control. Additional setbacks arose from a transmission right-of-way threat in 2022-2023, when a California rural electric cooperative threatened to condemn a right-of-way through the Project site, necessitating potential reconfiguration and halting progress until resolved. Tariff and pricing uncertainties have also emerged from recent U.S. trade policies, including increases to Section 201 tariffs and proposed broader tariffs, which have disrupted manufacturing, increased costs for imported components, and created uncertainty in construction pricing and Power Purchase Agreement (PPA) negotiations. Finally, interconnection and PPA delays have stemmed from NV Energy's interconnection schedule setbacks and ongoing PPA shortlisting processes, impacting progress despite the Project being shortlisted in multiple negotiations without a confirmed PPA as of this date.

These delays risk the permit expiring before construction can commence, potentially requiring a full re-application and wasting resources, but the Applicant continues to actively develop the Project, demonstrating commitment and progress through completed site design, secured UEPA permit from the Public Utilities Commission of Nevada (PUCN Docket 20-12032, with a pending motion for a two-year compliance extension to March 2028), maintained land options with eight private landowners, and coordinated efforts with agencies such as NDOW, TMFPD, and WCHD. This two-year extension aligns closely with the requested UEPA compliance extension to March 2028, providing necessary flexibility to account for ongoing market and regulatory uncertainties, maximizing efficiency, avoiding permit lapse, and supporting Nevada's clean energy goals by facilitating the Project's eventual completion. The Project is expected to begin construction within the extended period, targeting a commercial operation date (COD) in late 2028 or early 2029, subject to PPA finalization and interconnection, and upon completion, it will deliver significant benefits, including 150-200 construction jobs, 5 permanent jobs, and substantial tax revenues (~\$3.5 million in sales/use taxes and ~\$600,000 in annual property taxes).

The requested extension does not alter the Project's character, intensity, or impacts, and no intervening changes in conditions or plan revisions have occurred that would affect the analysis underlying the original and amended approvals. We respectfully request that this matter be scheduled for the next available Planning Commission hearing. Please do not hesitate to contact me should you require any additional information.

Very truly yours,



Douglas R. Thornley
Of Counsel
for Holland & Hart LLP

DRT:

AttachmentsEnclosures

cc: {name}|\n

Community Services Department
Planning and Building
AMENDMENT OF CONDITIONS
APPLICATION



Community Services Department
Planning and Building
1001 E. Ninth St., Bldg. A
Reno, NV 89512-2845

Telephone: 775.328.6100

Amendment of Conditions Development Application Submittal Requirements

Applications are accepted on the 8th of each month. If the 8th falls on a non-business day, applications will be accepted on the next business day.

If you are submitting your application online, you may do so at [OneNV.us](https://www.onenv.us)

1. **Fees:** See Master Fee Schedule. **Most payments can be made directly through the OneNV.us portal.** If you would like to pay by check, please make the check payable to Washoe County and bring your application and payment to the Community Services Department (CSD).
2. **Development Application:** A completed Washoe County Development Application form.
3. **Owner Affidavit:** The Owner Affidavit must be signed and notarized by all owners of the property subject to the application request.
4. **Proof of Property Tax Payment:** The applicant must provide a written statement from the Washoe County Treasurer's Office indicating all property taxes for the current quarter of the fiscal year on the land have been paid.
5. **Application Materials:** The completed Amendment of Conditions Application materials.
6. **Site Plan Specifications:**
 - a. Lot size with dimensions drawn using standard engineering scales (e.g. scale 1" = 100', 1" = 200', or 1" = 500') showing all streets and ingress/egress to the property.
 - b. Show the location and configuration of all proposed buildings (with distances from the property lines and from each other), all existing buildings that will remain (with distances from the property lines and from each other), all existing buildings that will be removed, and site improvements on a base map with existing and proposed topography expressed in intervals of no more than five (5) feet.
 - c. Show the location and configuration of wells, septic systems and leach fields, overhead utilities, water and sewer lines, and all easements.
 - d. Show locations of parking, landscaping, signage and lighting.
7. **Application Map Specifications:** Map to be drawn using standard engineering scales (e.g. scale 1" = 100', 1" = 200', or 1" = 500') clearly depicting the area subject to the request, in relationship to the exterior property lines. All dimensions and area values shall be clearly labeled and appropriate symbols and/or line types shall be included in the map legend to depict the map intent.
8. **Building Elevations:** All buildings and structures, including fences, walls, poles, and monument signs proposed for construction within the project shall be clearly depicted in vertical architectural drawings provided in accurate architectural scale. Architectural elevations of all building faces shall be presented.
9. **Submission Packets:** One (1) packet and a flash drive. Any digital documents need to have a resolution of 300 dpi. If materials are unreadable, you will be asked to provide a higher quality copy. The packet shall include one (1) 8.5" x 11" reduction of any applicable site plan, development plan, and/or application map. Labeling on these reproductions should be no smaller than 8 point on the 8.5" x 11" display. Large format sheets should be included in a slide pocket(s). Any specialized reports identified above shall be included as attachments or appendices and be annotated as such.

Notes:

- (i) Application and map submittals must comply with all specific criteria as established in the Washoe County Development Code and/or the Nevada Revised Statutes.

- (ii) Appropriate map engineering and building architectural scales are subject to the approval of the Planning and Building and/or Engineering and Capital Projects.
- (iii) All oversized maps and plans must be folded to a 9" x 12" size.
- (iv) Based on the specific nature of the development request, Washoe County reserves the right to specify additional submittal packets, additional information and/or specialized studies that clarify the potential impacts and potential conditions of development in order to minimize or mitigate impacts resulting from the project. No application shall be processed until the information necessary to review and evaluate the proposed project is deemed complete by the Director of Planning and Building.
- (v) **Labels:** If the assigned planner determines the abandonment will affect the access to a mobile home park, the applicant will be required to submit a list of mailing addresses for every tenant residing in the mobile home park.

Washoe County Development Application

Your entire application is a public record. If you have a concern about releasing personal information, please contact Planning and Building staff at 775.328.6100.

Project Information		Staff Assigned Case No.: _____	
Project Name: Rock Springs Solar (RSS)			
Project Description: CED Rock Springs Solar, LLC (Applicant) requests extension of an approved special use permit (WSUP21-0001) to construct a solar plus battery energy storage system on approximately 660 acres in Washoe County; see WSUP21-0001, WAC23-0003			
Project Address: Multiple parcels; see WSUP21-0001			
Project Area (acres or square feet): Approximately 660 acres; see WSUP21-0001			
Project Location (with point of reference to major cross streets AND area locator):			
Assessor's Parcel No.(s):	Parcel Acreage:	Assessor's Parcel No.(s):	Parcel Acreage:
Multiple parcels; see WSUP21-0001	Approximately 660 acres		
Indicate any previous Washoe County approvals associated with this application: Case No.(s). WSUP21-0001 and WAC23-0003			
Applicant Information (attach additional sheets if necessary)			
Property Owner:		Professional Consultant:	
Name: Multiple parcels; see WSUP21-0001 and WAC23-0003		Name: Holland & Hart LLP	
Address:		Address: 5470 Kietzke Lane, Suite 100	
Zip:		Reno, NV Zip: 89511	
Phone:		Phone: 775.327.3000	
Fax:		Fax:	
Email:		Email: DRThornley@hollandhart.com	
Cell:		Cell: 775.857.8905	
Other:		Other:	
Contact Person:		Contact Person: Doug Thornley	
Applicant/Developer:		Other Persons to be Contacted:	
Name: CED Rock Springs Solar LLC		Name: Scott Risley	
Address: 100 Summit Lake Dr., Suite 210		Address: 101 West Broadway, Suite 1120	
Vahalla, NY Zip: 10595		San Diego, CA Zip: 92101	
Phone: 914-286-7041		Phone: 619-507-4130	
Fax:		Fax:	
Email: mapellip@conedceb.com		Email: risleys@conedceb.com	
Cell: 914-400-6165		Cell: 619-787-4227	
Other:		Other:	
Contact Person:		Contact Person:	
For Office Use Only			
Date Received:		Planning Area:	
Initial:		Master Plan Designation(s):	
County Commission District:		Regulatory Zoning(s):	
CAB(s):			

Amendment of Conditions Application Supplemental Information

(All required Information may be separately attached)

Required Information

1. The following information is required for an Amendment of Conditions:
 - a. Provide a written explanation of the proposed amendment, why you are asking for the amendment, and how the amendment will modify the approval.
 - b. Identify the specific Condition or Conditions that you are requesting to amend.
 - c. Provide the requested amendment language to each Condition or Conditions, and provide both the ***existing*** and ***proposed condition(s)***.

CED Rock Springs Solar, LLC, requests a two-year extension of Special Use Permit WSUP21-0001 for the 120 MW Rock Springs Solar Project (with 120 MW battery storage) from April 2026 to April 2028, aligning with a pending UEPA permit extension to March 2028. The extension addresses unforeseen delays including a 2022-2023 transmission right-of-way threat, U.S. trade tariff uncertainties, and NV Energy interconnection/PPA setbacks.

2. Describe any potential impacts to public health, safety, or welfare that could result from granting the amendment. Describe how the amendment affects the required findings as approved.

None; the amendment relates only to the period for which the approved special use permit remains valid and active. No changes are proposed to the project's scope, site plan, or approvals.