

WINSTON ENERGY PROJECT FINAL PLANNED UNIT DEVELOPMENT_ AMENDED HANDBOOK

APPLICATION SUBMITTAL: PLZ-2026-040

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1. Introduction & PUD Approval Background

Winston FC Solar, LLC intends to construct the Winston Energy Project (Project), a 400-megawatt (MW) photovoltaic (PV) solar energy facility (facility) with a Battery Energy Storage System (BESS) located entirely on approximately 2,374.3 acres of privately owned land in Lyon County, Nevada. [The Project recently obtained final County approval as part of a Planned Unit Development \(PUD\) application.](#) The Project site is located just east of U.S. Alt Highway 95 (U.S. Hwy 95A), approximately 15 miles northeast of the City of Yerington, and adjacent to the Walker River Substation (f.k.a. Fort Churchill Substation). Ancillary facilities include a substation, collection lines, an Operations and Maintenance (O&M) building, and site access roads. Electricity generated by the Project will be connected to NV Energy's transmission system via a newly constructed 4,800-foot 345-kilovolt (kV) generation tie (gen-tie) line to the Walker River Substation, which is adjacent to the Project site.

The Project has an estimated capital investment of \$1.1 billion in land, buildings and equipment, and its employees, this ~~P~~project will generate an estimated \$100 million in net tax revenues after abatements over 40 years. It is estimated that a total of \$28.7 million will be generated in sales & use taxes and \$71.3 million will be generated in property tax revenues.

In 2022, the Project obtained a Conditional Use Permit from Lyon County (PLZ-2022-167) for a PV project for 1712.5 acres. On March 5, 2026, the Lyon County Board of Commissioners approved the request from the Project for a Planned Unit Development (PUD) for a 400 megawatt PV project, a Battery Energy Storage System (BESS), an electrical substation, high-voltage power lines and an operations and maintenance building on 11 parcels totaling approximately 2,374.3 acres. [On June 24, 2026, the Project received final County approval of -its Final Planned Unit Development \(PLZ-2026-040\). On July 10, 2026, the Notice of Final Action, the Winston Energy Project Final PUD Handbook, and related appendices and materials, wereas timely recorded \(Lyon County Recorder Document # 710455\).](#)

Surrounding lands are primarily private agricultural, rural, and industrial, in addition to public property administered by the Nevada Division of State Lands and Bureau of Land Management. The Project area is in the Mason Valley Character District, as defined by the 2020 Lyon County Comprehensive Master Plan. The Project is located in the Heavy Industrial – Suburban (HI-S) and Rural Residential 20 Acre Minimum (RR-20) zoning districts.

According to the Lyon County Development Code , the purpose of a Planned Unit Development (PUD) is to provide a flexible and creative approach to developing large parcels of land in a way that aligns with the county's master plan, while also encouraging high-quality design and a mix of amenities.¹ PUDs allow for integrated land uses to be conveniently located, and for developers

¹ LCC § 15.349.01(A).

to use creative designs that can improve efficiency, reduce development costs, and help preserve open space and environmental resources. Further justification for the use of a PUD can be found in Appendix A.

¹ LCC § 15.349.01(A).

This PUD Handbook serves as a governing document for the Winston Energy Project, bridging the County's Master Plan, zoning regulations, and other requirements with the specifics of the Project. Implementation of the Winston Energy Project will be expected to substantially conform to this document as approved by the Lyon County Board of County Commissioners.

Figure 1: Project Boundary

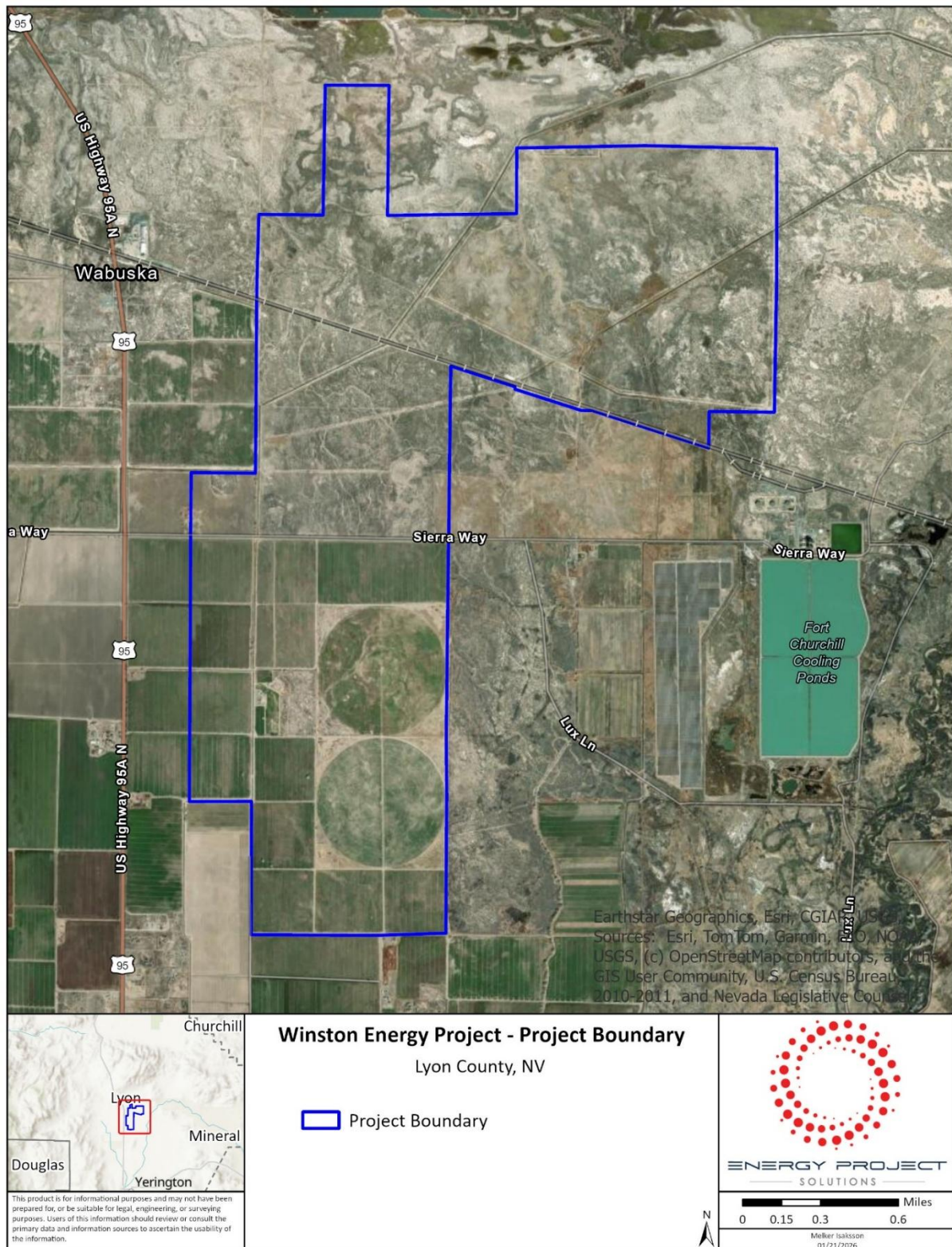


Figure 2: Land Use

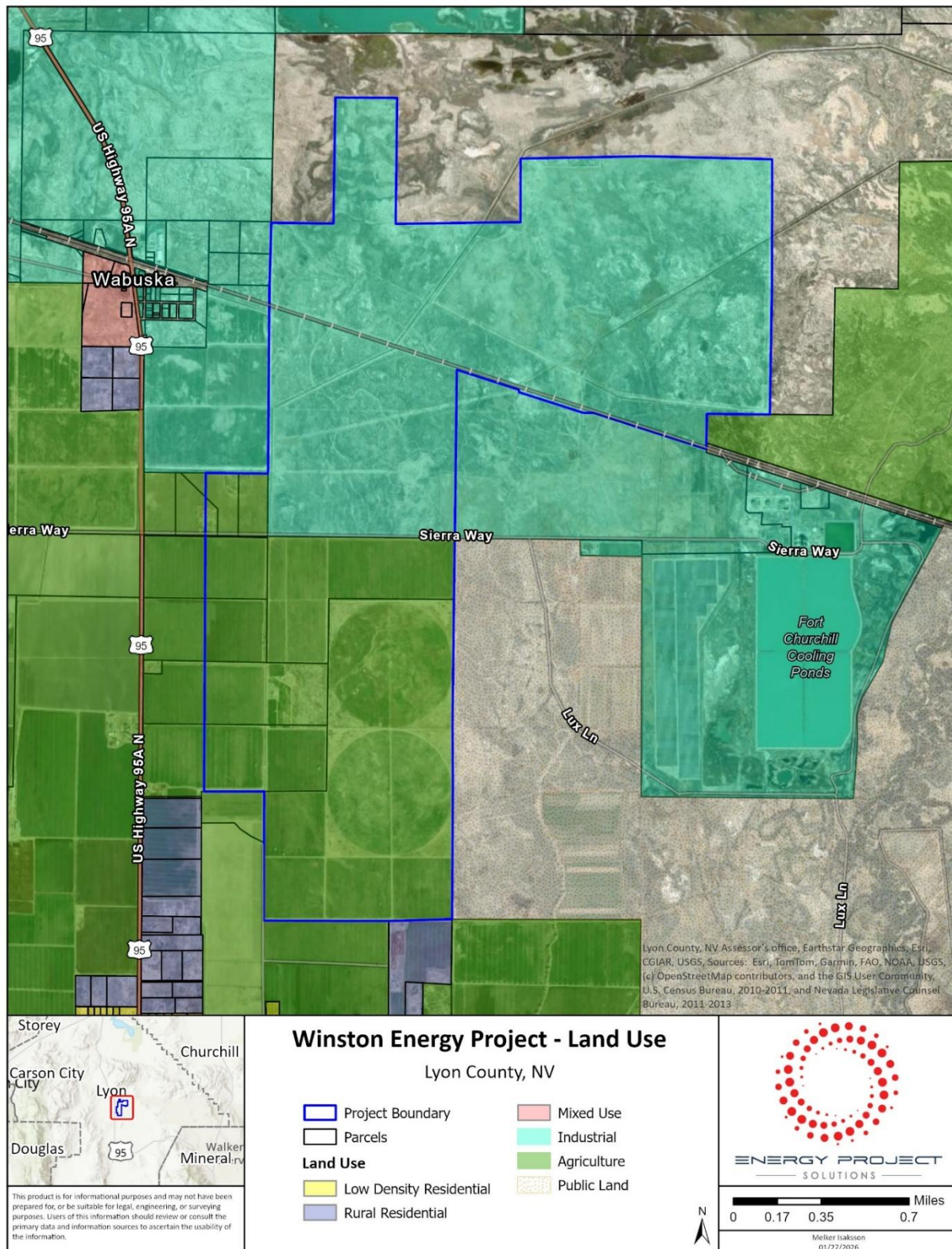
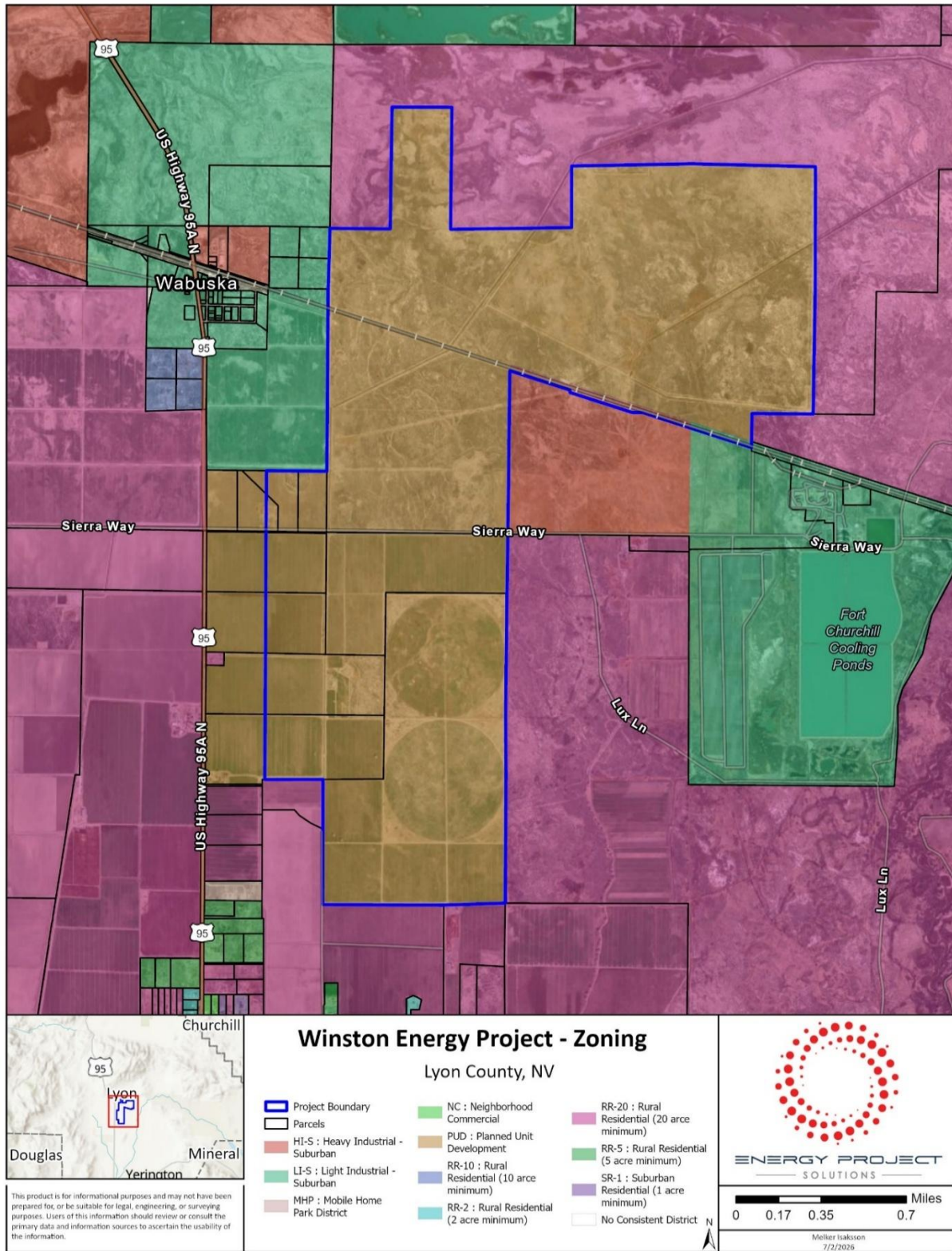


Figure 3: Zoning



2. Land Use and Design Standards

The Winston Energy Project is committed to maintaining the standards and criteria noted in Sections 15.336.06, 15.336.09, 15.336.12, 15.337.03, 15.401.03 of the Lyon County Code with the deviations and its rationale highlighted in Table 1 below.

Table 1: Standards and Criteria Compliance

Standards and Criteria	Description	Deviation from Standards/Proposed PUD Standard	Rationale
15.336.09.E.2 - Setback	Each commercial SECS array must generally be set a minimum of one half mile (2,640 feet) from a trail easement, highway and/or adjacent properties with an existing residential use. Setback distance increases to one mile (5,280 feet) from an airport, river, perennial or intermittent stream, and/or lake. An SECS may be placed closer than 2,640 feet from a property with an existing residential use, trail easement, or highway if it is separated by a geologic feature or building of a height sufficient to completely obstruct views of the commercial SECS from a point sixteen (16) vertical feet above the boundary of any Residential Zoning District. The Board of County Commissioners may, at their sole discretion, approve setbacks that are less than the setbacks outlined in this chapter if the project is a part of a Planned Unit Development (PUD).	A 2550% setback reduction (6601,320 feet) to the otherwise applicable setback distance results in a 1,980320-ft. setback to Highway 95 and a 30-foot landscaped buffer along the southern, western, and northern property edges as seen in Figure 12	- Portions of the original 2022 CUP were lost to the NV Energy Walker River Substation project, Requiring the acquisition of additional land well before Lyon County adopted the one-mile setback requirement. - Substation and BESS system will maintain a one-mile setback from highway. - The Pproject proposes visual screening along the southern, western and northern portions Pproject boundary adjacent to US Highway 95 to reduce visual impacts of the Pproject. - County Code permits the County Commission to reduce otherwise applicable setback distances for a

			commercial SECS where the SECS is part of a PUD. • The Project is consistent with multiple Lyon County Master Plan goals and policies promoting economic diversification, cost-effective siting of industry and business, natural resource stewardship, and renewable energy development. • <u>The proposed setback is necessary to accommodate an easement request for a high-voltage transmission line that would otherwise run along US95 highway. Reducing the setback would compensate for the acreage lost due to this easement.</u> • The proposed PUD supports Master Plan Policy LU 3.2, encouraging the appropriate siting of business and industry locations, the policy in emphasizes the “accommodation
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			of such development cost-effectively”
15.336.06.D.2 - Setback	Each LiBESS must be set a minimum of one mile (5,280 feet) from a trail easement, highway, river, perennial or intermittent stream, lake and/or property with an existing residential use. The Board of County Commissioners may, at their sole discretion, approve setbacks that are less than the setbacks outlined in this chapter if the project	• Half a mile setback	One residence falls within the setback, but the Battery Energy Storage System (BESS) will be positioned in a way that allows the substation to serve as a natural barrier, minimizing both visual and operational impacts. Additionally, the

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	is a part of a Planned Unit Development (PUD).		property owner supports the P project and has provided a letter of support
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Winston Energy - Preliminary Project Layout
Lyon County, NV

Legend:

- Project Boundary
- Solar PV Panels
- Substation, BESS, and O&M

Scale: 0 0.17 0.35 0.7 Miles

North Arrow

Small map inset showing the location of the project area within the state of Nevada, with labels for Carson City, Douglas, Mineral, and Walker.

2.1. Photovoltaic Array

The Project's solar PV facility will be composed of PV modules (panels), support structures, inverters, collection lines, and meteorological equipment as detailed below. These features will comprise approximately 1,894 acres of the Project site. All disturbances associated with the solar PV facility will be contained to private lands.

The Project's PV modules will utilize crystalline silicon, bi-facial, or thin-film PV panels that will be mounted on single-axis trackers. The panels will be oriented in north-south rows with the panels moving to track the sun as it moves across the sky during the day, which increases the overall efficiency and reliability of the PV modules. Each PV module will be mounted to a tracker system specifically designed to withstand wind, snow, and seismic loads anticipated at the Project site.

The PV modules will be designed using non-reflective materials and coatings to significantly minimize potential glare and reduce visual impacts on surrounding properties and nearby roadways, ensuring that the ~~P~~roject blends harmoniously with the existing landscape and

Figure 5: Photovoltaic Array



mitigates any potential visibility or distraction concerns for drivers traveling along Sierra Way and US Highway 95A N.

PV technology converts sunlight directly into direct current (DC) electricity. The DC electricity generated by the solar array is then collected at inverters where it is converted to alternating current (AC). The voltage of the electricity is increased by a transformer at each inverter. Medium voltage electric lines (underground and/or overhead) are then used to collect the electricity from each transformer and transmit it to the facility substation, where the voltage is further increased by a high voltage transformer to be transmitted to the electric grid. Multiple transformers will be connected in parallel via low voltage (12.5kV or 34.5kV) collector lines to the Project substation, where the power from the Project would be stepped up for delivery to the grid via the gen-tie lines described below.

The PV modules, inverters, and transformers will be grouped into array blocks of up to 5 MW DC each occupying approximately 12.5 acres. Inverter and transformer sizes would be selected based on cost and market availability prior to construction. The PV modules deployed for use in the proposed Project will comply with industry standards and will be electrically connected to the facility's grounding system in accordance with local codes and regulations. Final PV module selection will be determined during the detailed engineering phase of development.

The PV modules will be positioned onto a single axis tracking system, allowing the modules to move through the course of the day to track the sun. The highest point on the single-axis trackers it is expected to be 8 feet but it could reach up to a maximum of 12 feet if the site conditions such as topography or vegetation require a higher height, trackers will reach the maximum height during the morning and evening hours when the panels are tilted to face the rising or setting sun. The degree of tilt for each single-axis tracker would change over the course of each day. The PV units will be mounted on driven or pre-drilled H-pile foundations to support the panel mounting system. Site specific soil tests to validate the preliminary engineering would be performed prior to construction.

The Project's inverters and transformers will be housed in enclosures or covered by shade structures approximately 8 to 10 feet high. The Project will also include one or more small meteorological monitoring stations to track solar insolation, temperature, wind direction, and speed. These stations will have a height of approximately 8 to 13 feet and will be located within the solar PV facility boundary.

The perimeter of each continuous area of the solar PV facility will be secured with a 6 to 7-foot tall, chain link metal- fabric security fencing or game fence. If determined necessary, up to 2-foot

barbed wire or razor wire may be added to the top. Controlled access gates would be located at the site entrances to each area.

The Project's permanent lighting system will provide operation and maintenance personnel with illumination for both normal and emergency conditions near each main entrance and Fire Alarm Control Panel (FACP). Lighting will be designed to provide the minimum illumination needed to achieve safety and security objectives and will be downward facing and shielded to focus illumination on the desired areas only. There will be no lighting in the solar PV facility. Therefore, light intrusion affecting surrounding properties, if any, would be minimal. If lighting of individual solar panels or other equipment is needed for night maintenance, portable lighting would be used.

Figure 6: Inverter



2.2 Battery Energy Storage System (BESS)

The Project includes the construction and operation of a lithium Ion BESS that will store power generated by the solar PV facility and allow for the transfer of power to the electrical grid as needed. The BESS containers will be installed in a central location on the Project site, located adjacent to the Project substation.

The BESS will consist of multiple enclosures housing batteries connected in strings and mounted on racks. AC-coupled BESS design standards typically include monitoring equipment, cooling

units, active exhaust venting, multiple fire detection units including gas/heat/smoke detectors, and fire safety systems, which adequately address fire risk associated with the unit. (Fire risk and associated design requirements are addressed further in the Fire Safety Section.) AC-coupled BESS units typically require their own inverters on their own skid.

Figure 7: BESS



However, some equipment associated with the BESS (e.g., inverters, auxiliary transformer to control the HVAC system) may be adjacent to the enclosure with appropriate spacing considered for O&M access and fire safety.

Because the size of each battery enclosure varies widely by manufacturer, the total number of enclosures to be installed will not be known until a manufacturer has been selected. Each BESS enclosure will house hundreds of battery modules. Typical BESS enclosures are approximately 24 feet long by 8 feet wide by 9.5 feet high; however, these dimensions can vary by manufacturer, the height is not expected to exceed 12 feet. Each BESS enclosure is typically capable of storing between 2 to 5 MWh of energy. The batteries will be predominantly charged directly from the PV solar energy generated by the Project. Energy stored in the BESS will then be discharged into the grid when the energy is needed, providing important electrical reliability

services to the local and regional area. The total land disturbance attributed to the BESS facilities under this scenario will approximately be 25 acres, as detailed on the Project's Site Plan

Figure 8: BESS Yard



The perimeter of the BESS yard will be secured with a 6 to 7-foot tall, chain link metal- fabric security fencing or game fence. If determined necessary, up to 2-foot barbed wire or razor wire may be added to the top. Controlled access gates would be located at the site entrances to the yard.

2.3 Operations and Maintenance Building

The proposed O&M building will be approximately 3,600 square feet with a maximum height of approximately 25 feet. The single-story O&M building will contain administrative offices, parts storage, a maintenance shop, plant security systems, and plant monitoring equipment with 13 adjacent worker parking stalls. The O&M building will have exterior lighting on motion sensors, fire and security alarms, and would comply with all applicable laws and regulations (including applicable Operational Safety and Health Act [OSHA] requirements).

Figure 9: O&M Building



The perimeter of the O&M lot will be secured with a 6 to 7-foot tall, chain link metal- fabric security fencing or game fence. If determined necessary, up to 2-foot barbed wire or razor wire may be added to the top. Controlled access gates would be located at the site entrances to the lot.

2.4 Substation

The Project will also include the construction and operation of an on-site substation. The substation would accommodate a 345-kV gen-tie line, discussed in section 2.5 Transmission Generation Tie-in Line below. The substation equipment would include medium voltage (34.5

Figure 10: Substation



kV) to high voltage (345 kV) step-up transformer(s) with mineral oil, breakers, buswork, protective relaying, supervisory control and data acquisition (SCADA).

The substation equipment will be located within an approximately 7-acre area. The substation will be fenced for safety and security with a 6 to 7-foot tall, chain link metal- fabric security fencing. If determined necessary, up to 2-foot barbed wire or razor wire may be added to the top and designed in accordance with codes and standards applicable to Lyon County, including but not limited to IEEE (Institute of Electrical and Electronics Engineers), ANSI (American National Standards Institute), NEC (National Electrical Code), NESC (National Electrical Safety Code) the fence will be up to 7 ft height. However, one or more structures may be outside the fenced area for the specific purpose of accessing meters and control equipment. The communication system for the substation may include above- ground fiber optic cable and/or a microwave tower. If a fiber optic line is used, it would be mounted on the gen-tie line structures as one of the shield-wires.

Switching and transformer equipment and control enclosure will also be located at the substation site with a maximum height of 30 feet. The substation equipment will be designed to accommodate necessary setbacks and spacing between pieces of equipment and will include a drainage collection area consistent with local and state regulations. Transformers would be

Figure 11: Substation Yard



placed within a secondary containment area according to local and state regulations to prevent pollution of soil and water in the event of a spill the estimated height of the transformers is 25 feet.

The substation will utilize temporary task lighting as necessary to allow inspections and provide for safe movement within the substation and inside the substation fencing. Lighting will be designed to provide the minimum illumination needed to achieve safety and security objectives and will be downward facing and shielded to focus illumination on the desired areas only. All lighting will be shielded downward to minimize contributions to sky glow. Substation lighting would be designed to minimize potential impacts on wildlife and will avoid the casting of light toward surrounding wildlife habitat or surrounding properties in the vicinity of the Project area. The substation would be enclosed by fencing consistent with National Electric Code requirements.

2.5 Transmission Generation Tie-in Line

A new 4,800-ft., 345 kV gen-tie line will be constructed to connect the Project substation to the existing Walker River Substation. Approximately 500 feet of the proposed gen-tie line will be located within the Project area, and the remaining will be located within the Walker River Substation yard, where the electricity generated by the Project can be transmitted to the electrical grid. The Project will use H-frame or single steel pole structures made of self-weathering or galvanized steel. The structures would range in height from 120 feet to 170 feet.

The design, construction, operation, and maintenance of the gen-tie lines will meet requirements of the National Electrical Safety Code (NESC); U.S. Department of Labor, Occupational Safety and Health Standards; and requirements for safety and protection of landowners and their property. Transmission line design will also be consistent with recommendations for reducing negative impacts of power lines on birds found in Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 by Edison Electric Institute and the Avian Power Line Interaction Committee (APLIC) and Reducing Avian Collisions with Power Lines by the U.S. Fish and Wildlife Service and the APLIC.

2.6 Modified Setbacks

As shown in the Figure 12 below, the Winston Energy Project's PV array will be designed to comply with Lyon County Code 15.336.09.E.3 by maintaining setbacks around the Pproject boundary. Along the highway frontage, a 139280-ft. setback from US-95 was approvedis proposed to address potential visual and community character concerns and to accommodate the high voltage transmission line easement request that was initiated after the County already had approved the first Final PUD on June 24, 2026. While Lyon County Code 15.336.09.E.2 contemplatespecifies a minimum one-half mile (2,640-ft.) setback from highways or residential areas, this requirement cannot be fully met in certain parts of the Pproject. The County Development Code also allows for PUD-specific adjustments to setback distances, when they support designs that enhance efficiency and address public interests, which provides a basis for the requested setback adjustment.²/

For the Winston Energy Project, a 2550% reduction of the one-half mile setback is necessary along the US-95 frontage and for two adjacent participant residential properties whose owners have consented to the Pproject. Without these reductions, a significant portion of the PV array would be impacted, making the Project infeasible. Further justification for the reduced setback as expressly contemplated under Lyon Development Code is provided below:

- **Optimal Location for Energy Development:** The site benefits from partial industrial zoning, immediate adjacency to Nevada's largest energy hub (the Walker River Substation), and proximity to compatible uses such as the Wabuska geothermal facility and the proposed Monarch Data Center.
- **Site Expansion and Timing:** Portions of the original 2022 CUP site were lost to the NV Energy Walker River Substation project, requiring the acquisition of additional lands in 2023 and 2024—well before Lyon County adopted the one-mile setback requirement in

² Lyon County Ordinance No. 640 (Bill 2025-02); LCC § 15.336.09(E)(2) ("The Board of County Commissioners may,

at their sole discretion, approve setbacks that are less than the setbacks outlined in this chapter if the project is part of a Planned Unit Development (PUD).”

July 2025. The ~~P~~project also reserves land for continued maintenance and access for the Walker River Irrigation District facilities.

- **Compliance for Major Infrastructure:** The one-half mile setback will still apply to the Project's Battery Energy Storage System (BESS) and substation, which are the primary infrastructure elements. Only the PV array would be located within the reduced setback, and the panels are low-profile, low-visibility, low-noise, and low-hazard.
- **Mitigation Measures:** Along SR-95, the Project ~~has-is~~ ~~proposing-a~~proposing a 1,980~~320~~-foot ~~approved~~ setback from US-95 enhanced with visual screening and community character improvements, and a 30-foot landscaped buffer along the southern, western, and northern property edges, thus mitigating the potential visual impact to the community.

As noted in the Project Narrative, the proposed modification to the previously approved PUD plan is appropriate because it (1) does not include or affect residential development, (2) does not propose to add any new residential development, and (3) is a minor modification that does not require vacation or abandonment of any street, public sidewalks, or drainage easement and substantially complies with the approved plan. See, NRS 278A.410(3). The proposed modification supports the purposes and objectives of Lyon County Code Chapter 349, and "helps ensure that the purposes, goals, objectives and policies of applicable Lyon County Comprehensive Master Plans and maps are achieved." L.C.C. § 15.349.01.A(11).

The requested adjustment is critical due to the Project's unique configuration, which cannot accommodate a 400 MW solar facility under the current one-half mile setback. Additional usable acreage is needed to support the full PV array, associated infrastructure, access roads, easement requests and interconnection facilities.

Non-participating residences are located immediately adjacent to the PV array, with the closest residence approximately 1,320 feet from the ~~P~~project boundary. Moreover the Project will install a 30-foot vegetation screening along the south and west boundary where the residence are located, mitigating potential visual impacts.

As detailed in the Staff Report, the Project advances multiple policy goals and objectives outlined in aligns with the 2020 Lyon County Master Plan, which designates the area for partial industrial use, and is consistent with existing and planned utility infrastructure in the vicinity. Granting the requested setback adjustment enables a flagship energy ~~P~~project that enhances Lyon County's role as a hub for energy innovation, supports economic development and increased tax revenue, and promotes environmental and natural resources stewardship, without setting adverse precedent or causing public harm.

Winston Energy Project - Setbacks
Lyon County, NV

- Project Boundary
- 30' Vegetation Screening Buffer
- Quarter Mile Highway Setback
- Buildable Area

This product is for informational purposes and may not have been prepared for, or be suitable for legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the usability of the information.

Melker Issaksson
01/22/2026

3. Transportation and Circulation

3.1. Site Access

The Project will require vehicular access during construction, operation, maintenance, and decommissioning. An existing public road, Sierra Way, will be used to provide access to the Project site from SR-95. A limited number of access points along Sierra Way will be established for the Project which provide entry to the site internal access road network. The access will be used to accommodate equipment deliveries, the construction workforce, and ultimately, the operational needs of the Project. Construction traffic, which primarily consists of construction workers and truck deliveries will necessitate traffic management at the intersection of SR-95 and Sierra Way.

The ~~P~~project has completed a Traffic Impact Study (TIS) that has been reviewed and approved by the Nevada Department of Transportation (NDOT); The ~~TIS~~study evaluated the following two scenarios:

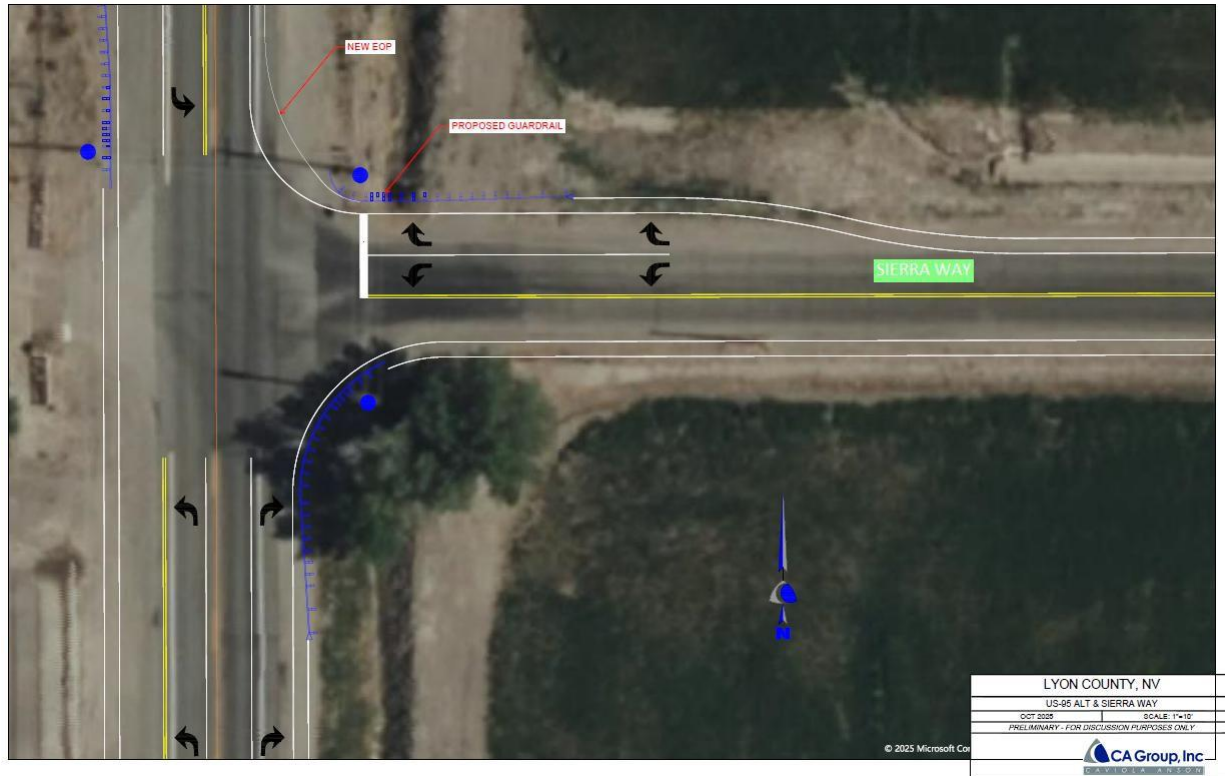
- **Scenario 1:** Analyzing the traffic impact generated solely by the construction of the Winston Energy Project.
- **Scenario 2:** Analyzing the cumulative traffic impacts from the concurrent construction of the Lux Solar project, the Monarch Data Center, and the Winston Energy ~~P~~project.

Both scenarios are considered highly conservative, assuming that most of the traffic will happen in the same hour and also that the cumulative effect of the projects will take place at the same date. The TIS identified expected mitigation measures likely required for the intersections analyzed. The Project is committed to facilitating the identified improvements for the US-95/Sierra Way intersection, including executing a form of Reimbursement Agreement or Cost Sharing Agreement with additional private parties that have been determined to affect NDOT and local roadways, and necessitating improvements off-site. Any such agreement will be finalized and recorded to the complete satisfaction of Lyon County, consistent with applicable development code provisions and state statute, prior to County issuance of Site Improvement permits for the ~~P~~project.

Access for existing and proposed infrastructure with the Project site would also be maintained. This includes the Walker River Irrigation District, railroad, gas pipeline, and NV Energy facilities. As feasible and appropriate, the ~~P~~project will also accommodate access for other adjacent uses.

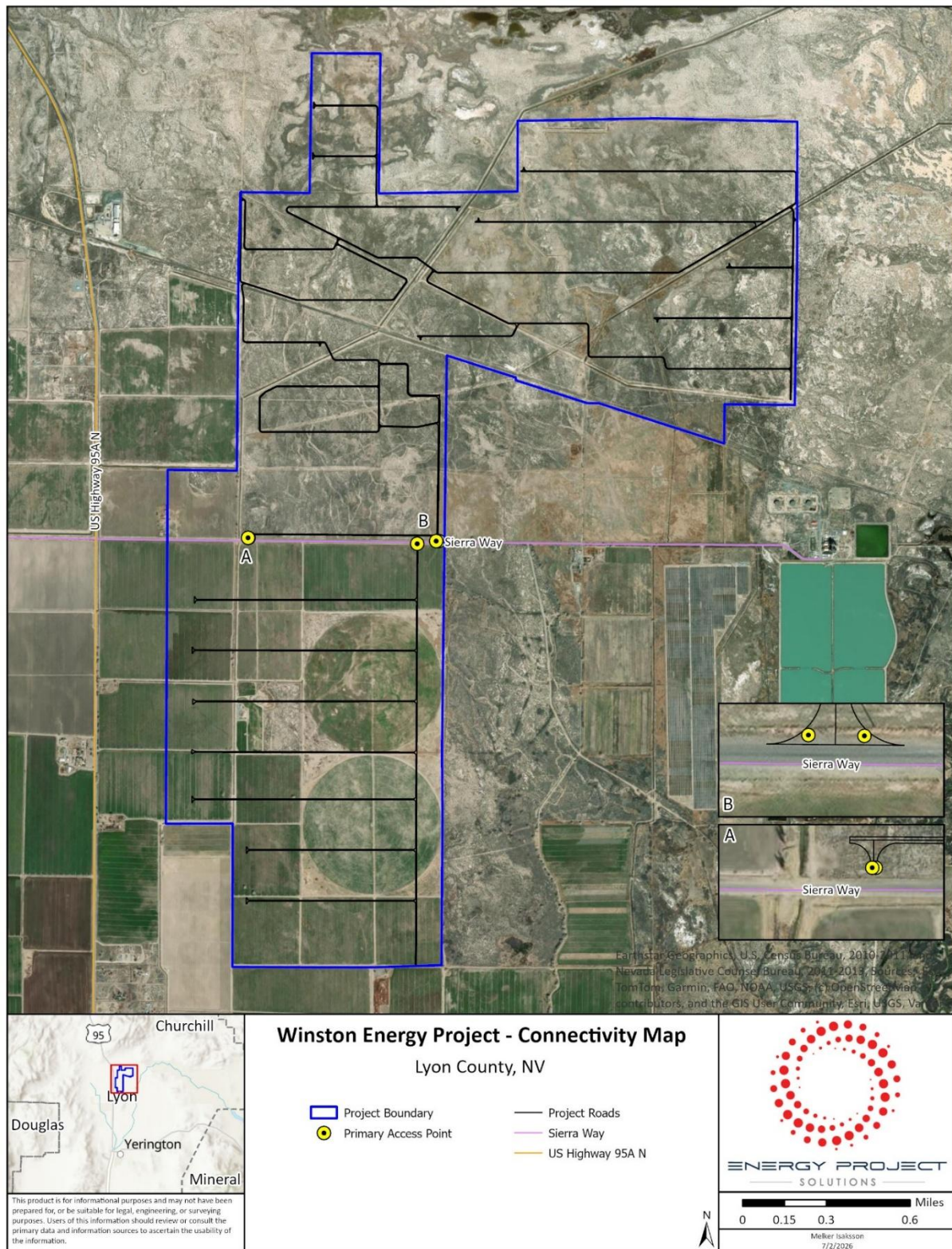
3.2. Internal Access

Figure 13: US-95 & Sierra Way Intersection



Internal gravel roadways will be developed throughout the Project area and will take access from Sierra Way. The internal roadway sections will include two travel lanes and would be approximately 20 to 24-feet wide to facilitate Project vehicles. The Applicant will maintain the internal roads throughout the life of the Project. The Project will require construction of approximately 24 miles of internal access roads. If necessary, water may be applied to work surfaces to aid soil compaction and for dust control. An estimated 150 to 250 acre feet of water would be needed for dust control during Project construction, which is substantially less than the water use authorized for the properties comprising the Project area.

Figure 14: Connectivity Map



4. Public Safety

4.1 Project Fire Protection Planning and System

While there is limited potential for wildfire at the Project site, the Applicant will coordinate with the Mason Valley Fire Protection District and other applicable entities, as appropriate, to define measures to further mitigate the risk of fire throughout the life of the Project. During Project operation, one or more aboveground water storage tank(s) will be installed on-site, if required by the Fire Protection District. The tank(s) will be sized to meet the County's requirements to supply sufficient water to contain a fire in the event of one taking place and prevent it from propagating across the site. Additional fire protection measures within the O&M building may be included based on collaboration with the Mason Valley Fire Protection District or Lyon County.

The Project's BESS will include self-contained enclosures would have its own fire detection system, which will comply with all local and federal fire code requirements. Each BESS enclosure will include multiple sensors for fire detection or an external fire detection system using infrared sensing capabilities. Additionally, the Project will have a fire alarm control panel located at the site entrance to alert local fire authorities remotely and on the panel itself of any trouble on site. The Project will use battery storage systems that are compliant with the following codes and standards:

- NFPA 855 – Standard for the Installation of Stationary Energy Storage Systems
- NFPA 70 - National Electric Code
- NFPA 72 – National Fire Alarm and Signaling Code
- UL 1973 – Standard for Safety: Batteries for Use in Stationary and Motive Auxiliary Power Applications
- UL 9540 - Standard for Safety: Energy Storage Systems and Equipment
- UL 1741 – Standard for Safety: Inverters

This includes the completion of Large-Scale Fire Testing. Large-Scale Fire Testing provides empirical data on the risk of fire propagation should a thermal runaway take place. To pass this test the BESS supplier must demonstrate that a fire in one enclosure will not cause thermal runaway to spread into adjacent enclosures.

The battery system will also include explosion prevention schemes, compliant with NFPA 69.

The ~~P~~roject will adopt a multi-layered approach to incorporate fire safety into the design, implementation, and operation of energy storage assets. The following strategy will be employed:

- **Technology selection:** Conscious review and selection of energy storage technologies which minimize the risk and exposure of thermal events. The Project will select the

technology that is more resistant to thermal runaway and propagation from a failed battery cell to its neighbors

- **Equipment qualification and vendor selection:** All major equipment will go through an exhaustive qualification process to ensure the highest safety, manufacturing, and quality standards are utilized, including strict audits of all its suppliers to evaluate their manufacturing quality and design for safety, vendor selection will require testing due diligence from BESS suppliers to ensure safety of products and completing thorough design reviews at each level of equipment used.
- **Large-Scale Fire Testing:** The Project will require that all BESS vendors conduct large-scale fire testing to assess the thermal exposure resulting from an intense fire in a BESS unit, with the aim of understanding the risk of propagation to nearby units or other exposures and require the arrangement for testing to mirror the ultimate installation setup of the BESS, along with any ancillary equipment.
- **Site level design strategies:** Design that minimizes risk of a thermal event, restricts propagation, and supports first responders, following UL and NFPA standards including preparation of an Emergency Response Plan, specific to the site.
- **Training:** Review of all processes for safe operations prior to implementation, and coordination with Mason Valley Fire Protection District as the local first responders to ensure proper training to deal with an event, should one occur.
- **Operations & Maintenance:** Strictly adhering to all maintenance requirements prescribed by equipment suppliers.

Moreover, the Project will develop and implement a comprehensive Risk Assessment that would include the engagement of an independent Fire Protection Engineer, with the following deliverables:

- **Hazard Mitigation Analysis (HMA):** systematic method that would identify potential failure modes, causes and effects, and develop mitigation solutions.
- **Failure Mode and Effects Analysis (FMEA):** identifying the ways, or modes, in which something might fail where any errors or defects and studying the consequences of those failures.
- **Fire Risk Assessment (FRA):** identification of potential hazards and risks and recommendations on how to reduce or remove the identified fire risks.
- **Plume Study:** Analysis of the gases emitted from a fire should one occur and the identification of routes that such gases would follow.

4.2 Fire and Emergency Services

To ensure safety for site personnel, communities, and first responders Emergency Preparedness and Response Procedures Plans (EPRP) will be created and adapted to reflect the unique

characteristics of **Pproject** such as the selected technology, specific fire risks and the local regulatory requirements of Lyon County and the Mason Valley Fire Protection District.

The detailed Emergency Response Plan will be custom designed for the **Pproject** in the future. At this stage, a specific plan cannot be developed because the specific technology has not yet been selected, which is typical for the industry. Technology selection usually occurs approximately one year before deliveries. Once the technology and vendors are secured for the **Pproject**, the EPRP will be tailored specifically to those selections, ensuring the most effective and appropriate emergency response protocols.

The development of the EPRPs will follow this strategy:

- **Coordination and **Pproject** familiarization:** The Project will coordinate with first responders to build familiarity with the layout, equipment, and any potential fire risks specific to the Winston Energy Project, making sure responders understand the potential hazards of the BESS when developing effective response protocols.
- **Joint Development of Emergency Procedures:** This includes fire containment strategies, proper safety perimeters, firefighter entry limitations near energized equipment, and protocols for safely isolating battery and storage systems.
- **Pre-incident Training:** Comprehensive training tailored to the BESS facility will be provided to emergency responders as outlined in similar projects, covering key topics such as thermal runaway management and hazard identification. This ensures responders are equipped and prepared to tackle unique risks associated with lithium-ion battery fires.
- **Battery Energy Storage System Safety:** The plan will incorporate fire protection systems designed specifically for the safe operation of lithium-ion batteries. This includes advanced smoke, heat, and gas detection technologies.
- **Comprehensive Emergency Procedures:** The EPRP will outline actions for onsite personnel during fire-related events, prioritizing safety, accountability measures, evacuation, and coordination with offsite responders, a copy of the EPRP will be supplied to the Mason Valley Fire Protection District,
- **Strategic Fire Response:** Emergency protocols will reflect methodologies proven effective for mitigating battery fires, including measures to minimize risks associated with thermal runaway, electrical shock hazards, and structural fire propagation.
- **Site integration and situational awareness tools:** Real-time monitoring systems such as thermal cameras, gas detection devices, and expert-driven onsite integration will be incorporated into incident management. Decision trees will be available to responders for rapid assessment and customized reactions.
- **Onboarding Fire Safety Training:** All Project personnel will undergo the proper training on how to respond in the case of an incident including a safe shutdown of the plant and evacuation of the facilities.

In compliance with Lyon County's code regarding fire protection for Energy Storage Systems (ESS) and Lithium-Ion Battery Energy Storage System (LiBESS), the Winston Energy Project will establish an agreement with the Mason Valley Fire Protection District to ensure comprehensive fire

protection, inspection, and emergency medical services. Prior to construction, the Project will obtain the necessary approvals from the Fire Protection District and will incorporate any required firefighting equipment and training measures as stipulated. The Project proponent will develop and submit an alternative plan outlining how fire protection, inspections, and emergency medical services will be delivered to ensure the safety of personnel, the community, and first responders. This plan will be integrated into the Emergency Preparedness and Response Procedures to maintain compliance and readiness, an example of the EPRP has been attached as Appendix G. The Emergency Preparedness and Response Procedures Plans must be finalized prior to the County issuance of Building Permits for the BESS system, buildings, or solar array. A Hold Harmless and Indemnification agreement will be recorded to protect the District from liability, claims, or damages arising from damage to the ~~P~~roject's assets.

4.3 Police Services

Law enforcement at and around the Project site will be served by the Lyon County Sheriff. Energy projects result in very little demand for law enforcement. Security at the site is achieved primarily through design and structural means in compliance with NERC requirements.

4.4 Spill Prevention and Control

Project construction activities will involve the use of fuels and greasers to ensure construction equipment is sufficiently maintained and operational. Such substances may be stored in temporary aboveground storage tanks or sheds located on the Project site. The fuels stored on site will be in a locked container within a fenced and secure temporary staging area.

The small quantities of substances to be stored at the Project site during construction could include fuels, oils, and chemicals required for equipment and facilities maintenance. These materials will be stored in their appropriate containers in an enclosed and secure location, such as portable outdoor hazardous materials storage cabinets equipped with secondary containment to prevent contact with rainwater. The portable chemical storage cabinets may be moved to different locations around the site as construction activity locations shift. The chemical storage area would not be located immediately adjacent to any drainage. Disposal of excess materials and waste would be performed in accordance with local, state, and federal regulations; excess materials/waste would be recycled or reused to the maximum extent practicable.

If quantities exceed regulatory thresholds, the Applicant will ensure that storage is undertaken in compliance with the Spill Prevention, Control, and Countermeasure Rule and a Hazardous Materials Business Plan, which will be developed prior to construction. The use, storage, transport, and disposal of hazardous materials used during Project construction would be carried out in accordance with federal, state, and county regulations. No extremely hazardous substances are anticipated to be produced, used, stored, transported, or disposed of during

construction. Material safety data sheets for all applicable materials will be made readily available to on-site personnel. Construction materials will be sorted on site throughout construction and transported to appropriate waste management facilities. Recyclable materials would be separated from non-recyclable items and stored until they could be transported to a designated recycling facility.

5. Public Infrastructure, Services, and Utilities

5.1 Water Supply

Water consumption for the Project will be divided between construction and operational activities, with the highest use occurring during construction. Water for construction activities, primarily for dust control, will be sourced from an on-site well. During operations, potable water may be provided by the County (if service is available), sourced from an on-site well, or stored in a 15,000-gallon storage tank on-site.

Additionally, non-potable water storage tanks required for fire department use may also be installed on-site as per NFPA requirements. Overall, water consumption during the peak construction period will remain significantly below the total water rights authorized for the properties within the Project area. No water will be used for panel washing.

5.2 Sewer Service

The Project plans to utilize an on-site septic tank to manage wastewater, providing a reliable and self-contained solution. By relying on this system, the Project can ensure proper sanitation, environmental compliance, and uninterrupted operations throughout the construction period.

5.3 Walker River Irrigation District

The Project site includes irrigation canals that cross the proposed boundary. These canals are managed by the Walker River Irrigation District (WRID). The Project team has been in ongoing coordination and communication with WRID to identify the canals and understand the District's needs and requirements, including the setback the irrigation canals is 50 feet from both sides of the centerline of the ditch. Prior to applying for any mass grading or building permits, the Project will obtain WRID's approval for the development and improvement plans. These plans will ensure that the Wabuska Drain continues to fulfill its primary purpose, provides WRID with the necessary easements for maintenance access, and ensures that any proposed improvements do not interfere with WRID's infrastructure or maintenance activities.

5.4 NV Energy

The Project has obtained a Letter of Intent to Serve from NV Energy, confirming the utility's commitment to provide electrical service to the Project site. A copy of this letter has been included in Appendix E.

5.5 Communications

The Project intends to use a satellite provider to supply both internet and phone services, ensuring reliable communication capabilities even in remote or undeveloped areas where traditional infrastructure may be limited or unavailable. By relying on satellite technology, the ~~P~~roject can maintain consistent connectivity for operations, data transmission, and coordination among team members.

5.6 Offsite improvements

As outlined in various sections of the PUD handbook, the TIS has identified mitigation measures expected to be required for the intersections that were analyzed as part of the TIS. NDOT has thoroughly reviewed and approved the findings of the TIS, ensuring that all relevant traffic concerns have been addressed.

As part of this Project, the proponent is committed to implementing recommended improvements specifically for the US 95/Sierra Way intersection. In addition, the proponent will execute a formal Reimbursement Agreement or a Cost Sharing Agreement, as applicable, which will include additional stakeholders as parties who have been identified as having an impact on NDOT and local roadways that necessitate off-site improvements.

Before the issuance of construction permits on the ~~P~~roject site, these agreements will be finalized and recorded, consistent with Lyon County Code and state statute, to ensure that all necessary improvements are facilitated to enhance traffic conditions in the area. Ultimately, the implementation of these improvements is expected to yield significant long-term benefits for the residents of Lyon County, promoting safer and more efficient transportation options for the community as a whole. By proactively addressing these issues, the Project proponent intends to foster a collaborative approach to development that prioritizes the needs of local residents while supporting sustainable growth in the region.

6. Agency Coordination/Permitting

6.1 County

6.1.1 Planned Unit Development (PUD)

On March 5, 2026, the Lyon County Board of County Commissioners, at a duly noticed public hearing, unanimously approved (5 Ayes; 0 Nays; 0 Abstentions) a request from Winston FC Solar, LLC for a Planned Unit Development (PLZ-2025-084) for the Winston Energy Project. The Project consists of a 400-megawatt photovoltaic solar energy facility with approximately 780,000 solar panels, a battery energy storage system, an electrical substation, high-voltage power lines, and an operations and maintenance building on 11 parcels totaling approximately 2,374 acres in Mason Valley, subject to Heavy Industrial-Suburban (HI-S) and Rural Residential, 20-Acre Minimum (RR-20) zoning (APNs 014-091-[13, 15, 16, 17, 22], 014-201-[14, 17, 18, 32, 33, 35]). The PUD was approved based on Findings A through F, with a condition establishing a 1,980-foot setback — a 25% reduction from the standard half-mile (2,640-foot) requirement — from US Highway 95A. The PUD findings and the Winston Energy Project’s compliance with each are summarized below.

A. In what respects the plan is or is not consistent with the statement of objectives of this chapter;

- The Winston Energy Project is located within an established Industrial and Rural Residential zone identified in the Land Use Plan, ensuring compatibility with surrounding uses and alignment with the Mason Valley Character District as defined in the 2020 Lyon County Comprehensive Master Plan.
- The Project is directly adjacent to the Walker River Substation (f.k.a. Fort Churchill Substation), minimizing the infrastructural demand, resource impacts, and visual contrast associated with transmission infrastructure.
- The development of Project components will provide sustainable renewable energy resources to Nevada Energy’s transmission system, serving both Lyon County residents and residents throughout the state.
- The development of renewable energy resources in the region will contribute to the long-term resilience of Nevada’s energy infrastructure by diversifying the state’s energy portfolio.
- Unlike fossil fuel development, solar PV facilities require minimal water for operation, which is especially critical in Lyon County, where water resources are scarce and better utilized for agricultural purposes.

- Solar facilities produce no air pollutants or greenhouse gases during operation, offering a clean alternative to fossil fuels and contributing to Lyon County’s and Nevada’s renewable energy goals.

B. The extent to which the plan departs from zoning and planned unit development regulations otherwise applicable to the property, including but not limited to density, size and use, and the reasons such departures are or are not deemed to be in the public interest;

- The Winston Energy Project is located within the Heavy Industrial-Suburban (HI-S) and Rural Residential 20-Acre Minimum (RR-20) zone districts. The PUD facilitates a coordinated development of solar energy infrastructure across multiple parcels and zoning designations, consistent with Lyon County’s objective of enabling large-scale energy development.
- The Board approved a 1,980-foot setback from US Highway 95A — a 25% reduction from the standard half-mile (2,640-foot) requirement. This departure was deemed to be in the public interest because: (a) portions of the original 2022 CUP site were lost to the NV Energy Walker River Substation project, requiring the acquisition of additional land well before Lyon County adopted its setback requirements; (b) the Project includes a 30-foot landscaped buffer along the southern, western, and northern property edges with visual screening; and (c) the BESS and substation, the Project’s primary infrastructure elements, continue to maintain the full setback.
- The proposed PUD supports Master Plan Policy LU 3.2, encouraging the appropriate siting of business and industry locations and emphasizing cost-effective accommodation of such development.
- Lyon County Code permits the County Commission to reduce otherwise applicable setback distances for a commercial Solar Energy Conversion System (SECS) where the SECS is part of a Planned Unit Development, providing an explicit regulatory basis for the approved departure.

C. The purpose, location and amount of the open space in the planned unit development, the reliability of the proposals for maintenance and conservation of the open space and the adequacy or inadequacy of the amount and purpose of the open space as related to the proposed density and type of residential development;

- The Winston Energy Project is a utility-scale solar energy facility, not a residential development. Open space within the ~~P~~project boundary will be managed to preserve native vegetation to the extent practicable, with selective mowing and trimming only as necessary for safe operation of the solar panels and tracker systems.

- The Project's solar arrays will be installed in a manner that allows for the preservation of native vegetation and maintenance of existing soil integrity within the array areas, consistent with Lyon County's environmental stewardship goals.
- A 30-foot landscaped buffer will be maintained along the southern, western, and northern property edges adjacent to US Highway 95A to reduce visual impacts and enhance the character of the highway corridor.
- At decommissioning, the land will be largely restorable to its natural state, as the PV arrays' supporting equipment sits on the surface and pile foundations can be removed with minimal disturbance.

D. A physical design of the plan and in the manner in which such design does or does not make adequate provision for public services, provide adequate control over vehicular traffic, parking requirements, and further the amenities of light and air, recreation and visual enjoyment;

- The Winston Energy Project has completed a Traffic Impact Study (TIS) reviewed and approved by the Nevada Department of Transportation (NDOT). The Project is committed to making all identified improvements at the US-95A/Sierra Way intersection, including installation of turn lanes, deceleration lanes, signage, and traffic controls as required.
- The BESS and substation are positioned near the center of the Project area to minimize visual and noise impacts on surrounding uses. PV modules utilize non-reflective materials and coatings to minimize glare and reduce visual impacts on surrounding properties and nearby roadways.
- All Project lighting will be shielded and downward-facing to prevent light pollution, consistent with Lyon County's dark-sky objectives. The site remains largely inactive at night, as solar generation occurs during daylight hours.
- The Project includes 13 worker parking spaces adjacent to the O&M building and approximately 24 miles of internal access roads throughout the site for operational and maintenance needs. Access to existing and proposed infrastructure within the Project site will also be maintained, including for the Walker River Irrigation District, railroad, gas pipeline, and NV Energy facilities.

E. The relationship, beneficial or adverse, of the proposed planned unit development to the neighborhood in which it is proposed; and

- The Project is located directly adjacent to the Walker River Substation and in proximity to compatible industrial and energy uses, including the Lux Solar Center and the proposed Monarch Data Center, minimizing impacts to residential and agricultural land use types.
- The nearest non-participating residential structure is approximately 1,320 feet from the ~~Pp~~project boundary. The project includes a 30-foot vegetation screening buffer along the

southern and western boundaries where residences are located, and the BESS and substation serve as a natural barrier, further minimizing both visual and operational impacts.

- The Project is estimated to generate approximately \$100 million in net tax revenues after abatements over 40 years — including approximately \$28.7 million in sales and use taxes and \$71.3 million in property tax revenues — providing significant and long-term economic benefit to Lyon County.
- The facility's clean and quiet operation avoids conflicts with nearby land uses. Solar energy facilities produce no waterborne pollutants, protecting surface and groundwater resources, and emit no air pollutants or greenhouse gases during operation, directly contributing to improved air quality in the region.

F. In the case of a plan which proposes a development over a period of years, the sufficiency of the terms and conditions intended to protect the interest of the public and the residents of the planned unit development in the integrity of the plan.

- The Winston Energy Project commits to complying with all [applicable](#) standards and requirements imposed under the Lyon County Code, the findings of the PUD approval (PLZ-2025-084), and all other requirements included in this Planned Unit Development Handbook, which serves as the governing document for the Project throughout its operational life.
- The Project has an anticipated operational life of up to 40 years. At the end of its productive lifetime, the applicant may decommission the site and restore it, or seek an extension or recommissioning with updated technology, in full compliance with applicable federal, state, and county regulations.
- Prior to construction, the Project will obtain all required building permits, encroachment permits for driveway cuts affecting public rights-of-way, and other applicable discretionary and non-discretionary permits, in coordination with Lyon County and relevant state agencies.
- The Project proponent will enter into a Reimbursement Agreement with all development parties to ensure that traffic improvements identified in the NDOT-approved Traffic Impact Study are funded on a pro rata basis, recorded to the satisfaction of Lyon County prior to the issuance of construction permits.

6.2 State

6.2.1 Nevada Department of Transportation (NDOT)

To ensure that the ~~P~~project has minimal effects on the traffic in the area, a Traffic Impact Study was conducted and submitted to the Nevada Department of Transportation for review. This study analyzed two scenarios, (1) examined the traffic impact generated solely by the construction of the Winston Energy Project and (2) analyzed the cumulative traffic impacts from the concurrent construction of the Lux Solar project, the Monarch Data Center, and the Winston Energy project. The TIS determined that the following infrastructure improvements will be needed to mitigate any impacts from the Winston Energy Project:

1. US 95A and Sierra Way intersection
 - a. Install a northbound right-turn deceleration lane per NDOT's Access Management System and Standards (AMSS).
 - b. Install a southbound left-turn deceleration lane per NDOT's AMSS. Include a minimum of 100' of storage.
2. Install a right-turn pocket for the westbound Sierra Way approach. Provide WB-67 design vehicle turning templates
3. Install signing and striping per NDOT and MUTCD standards

The following additional improvements will need to be installed to mitigate the cumulative impact of the multiple developments planned on US 95A in the ~~P~~project vicinity:

1. US 95A and Sierra Way intersection
 - a. Install a northbound left-turn deceleration lane per NDOT's AMSS. Include a minimum of 100' of storage
 - b. Install a southbound right-turn deceleration lane per NDOT's AMSS
 - c. Install a right-turn pocket for the eastbound Sierra Way approach
 - d. Install a northbound acceleration lane for the westbound and northbound right-turn movement per NDOT AMSS.
 - e. Install a temporary signal
2. Us 50 and Ramsey Weeks Cutoff Intersection
 - a. Install a right-turn pocket for the northbound Ramsey Weeks Cutoff approach
 - b. Monitor traffic safety and operations for need of a temporary traffic signal. If delay is exacerbated beyond the LOS E identified in the study or queues become excessive, resulting in unsafe driver behavior, a traffic signal will be required
3. US 95A and Ramsey Weeks Cutoff Intersection
 - a. Install an eastbound right-turn pocket
 - b. Install an acceleration lane on US 95A for the eastbound Ramsey Weeks Cutoff to southbound US 95A movement.

- c. Improve the northbound US 95A left turn pocket to NDOT's AMSS requirement with a 100' minimum of storage
4. US 95A and SR 339 intersection
 - a. Install a southbound left-turn lane with 50' minimum storage per NDOT AMSS
 - b. Install a temporary signal
5. Provide WB-67 design vehicle turning templates
6. Install signing and striping per NDOT and MUTCD standards

Winston Energy Project is committed to making the necessary improvements to mitigate the impact of the ~~P~~roject itself and the cumulative impacts of the projects in the area. Continued coordination with Lyon County staff and stakeholders will ensure that traffic in the area is not impacted by the development and that any improvements necessary are funded by the developers on a pro rata basis where traffic impacts of each project will be determined by an approved NDOT and the County.

6.2.2 Nevada Division of Environmental Protection (NDEP)

The Nevada Division of Environmental Protection (NDEP), Bureau of Water Pollution Control, will require a water pollution control permit for the Project. Based on the scope of the Project, it will also require an NDEP Construction Stormwater General Permit. This permit is mandatory for projects that disturb more than one (1) acre of land during construction, among other requirements.

Before filing a Notice of Intent (NOI) with NDEP, a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The SWPPP will include, among other things, the identification of a team responsible for overseeing compliance with the permit requirements.

Additionally, the Project will likely need a Surface Area Disturbance (SAD) permit, as it is expected to disturb more than five (5) acres for purposes unrelated to agriculture.

Coordination with NDEP will be necessary to ensure the Project complies with applicable environmental standards for air, water, and land. According to the Lyon County Planning Department, NDEP approval and all required permits must be obtained and submitted during the later stages of the Project, prior to the beginning of construction.

6.2.3 Public Utilities Commission of Nevada (PUCN)

The Project falls under the scope of the Utility Environmental Protection Act (UEPA),³ which addresses environmental considerations related to the construction of utility facilities, administered and enforced by the PUCN.

The Project qualifies as a “utility facility” under UEPA because its generation component exceeds the nominal nameplate generating capacity of 70 MW. According to statute, a UEPA construction permit must be issued by the PUCN before construction can commence. The Project’s application for a UEPA permit was approved on July 29, 2025.⁴

As part of the UEPA permitting process, the Project was also required to submit a notice to the Nevada Department of Wildlife (NDOW) and provide a \$10,000 deposit to conduct a NDOW site survey. This notice and deposit were submitted to NDOW on March 15, 2023, and the notice was included with the Project’s UEPA application to the PUCN.

³ NRS 704.865, *et seq.*

⁴ See, PUCN Order, Docket No. 25-04029 (Aug. 6, 2025).

7. Phasing/Implementation

7.1 Project Approvals

As noted in detail above, the Project has received prior approvals from Lyon County (e.g., the 2022 CUP), and has been unanimously ~~recommended for~~ approved by the Lyon County Board of County Commissioners. State-level approvals include UEPA permitting by the PUCN, NDEP-issued water pollution control permits, as well as fully reviewed and approved TIS by NDOT. Additional agreements with appropriate parties to facilitate necessary transportation impact improvements, as identified in the NDOT-approved TIS, will be negotiated, finalized, and recorded prior to the issuance of any construction permits.

7.2 Construction

Project construction is anticipated to begin in Quarter 2 of 2027, with commercial operations anticipated to commence in Quarter 4 of 2029. Construction of the Project is expected to occur over 18-24 months and would consist of several phases, including mobilization and staging, improvements to access roads, PV facility construction, BESS construction, gen-tie line construction, demobilization of equipment and staging areas, and interim site reclamation.

Concept design and preliminary NDOT coordination activities started on May 2026, encompassing field surveying (including NDOT traffic control approval) and concept design for the Winston Energy mitigation improvements. NDOT coordination is anticipated to conclude by late June 2026.

Final design of the proposed improvements recommended by the TIS is planned to begin in late June 2026, with completion targeted for mid-September 2026. The NDOT Occupancy Permit Application is planned to be submitted in late September 2026.

Following submittal, NDOT will conduct its review and comment period. Final permit approval is tentatively anticipated by late December 2026, subject to NDOT's approximately 12-week review timeline. Final construction-ready plans are planned to be delivered to Winston Energy within one week of permit approval, targeting the end of December 2026.

7.2.1 Construction Workforce

The projected construction work force discussed below includes all personnel required to complete construction of the Project including overall Project and site management, laborers, skilled craft, and startup personnel. The Project's construction workforce is expected to consist of approximately 350 to 450 personnel during peak construction activities and will include both construction workers and support personnel, such as surveyors and project managers. Up to 350 workers are expected to work on the site at its peak. This peak usually occurs during panel installation which can last up to 6 months. Prior to this peak period, there is an approximate

6month period of site preparation when the workforce is about 50% of peak. After the peak period, the work force quickly ramps down to about 25% of the peak for the final 6 months of the project construction.

Skilled craft and laborers would be drawn from the local area, while construction management and startup functions would be provided by relocated personnel from the Applicant's designated engineering, procurement, and construction (EPC) contracting firm.

7.2.2 Site Preparation and Grading

Site-preparation activities will include surveying, vegetation clearing and grubbing, and grading. Prior to the initiation of any construction, the necessary permits will be obtained.

Vegetation clearing and grubbing for the Project will commence immediately prior to the beginning of construction activities, to minimize the potential for soil erosion. Vegetation will be permanently cleared from roadways, access ways, and at inverter equipment, substation, BESS, and O&M building locations. Within the solar PV facility, native vegetation will be left in place to the extent practicable, with some mowing and selective trimming as needed to create a safe work environment and avoid interference with the movement of the solar panels. Prior to construction, vegetation throughout the solar array areas will be mowed to a height of 18 inches leaving the roots intact to facilitate regrowth during operations. Construction equipment may drive over and crush the vegetation during installation of the arrays.

Following initial site preparation and vegetation removal, grading will be completed with the use of standard heavy equipment, such as bulldozers. Grading activities will conform to accepted slope stability requirements and all Nevada Division of Environmental Protection (NDEP) best management practices (BMP).

The proposed improvements for the facility will be constructed at existing grade where possible. Within the Project area, some grading will be required to accommodate the substation, O&M building, BESS enclosures, internal roads, electrical equipment pads, and where the PV module support foundations are driven or drilled. A small, graded pad may be required within each solar array to accommodate the associated inverter and transformer, or they could be installed on driven piers. Additionally, excavation will be required for trenches for electrically connecting some of the equipment on site. Following construction, all underground trenches will be filled with native soils and/or imported fill and compacted.

A Fugitive Dust Control Plan to reduce fugitive dust during grading will be prepared prior to construction.

7.2.3 Construction Sequencing

Construction activities will occur over an 18-24 month period and will include the following phases and sequencing:

- **Fencing** – Permanent exterior fencing will be installed.
- **Clearing** – Vegetation removal for installation of the solar facilities will be completed only as necessary in advance of equipment installation. Clearing will be conducted to minimize the amount of disturbed ground surface at any one time.
- **Site Grading** – Because of the relatively flat topography at the site, relatively minimal volumes of soil will be moved for grading, however, minor grading activities may be required for the development of substation, O&M building, BESS enclosures, internal roads, electrical equipment pads, and other ancillary equipment
- **Parking and Laydown** – Parking areas for construction workers and laydown areas for construction materials will be prepared inside the Project area. Detailed information regarding the location of the laydown and parking areas for the Project will be developed after an EPC is hired to construct the facility.
- **Site Roads** – The internal site roads will be constructed in phases throughout the construction period. All internal access roads will be maintained throughout the life of the Project.
- **Foundation Construction** – Foundations for the substation, inverters and transformers, O&M building, and BESS enclosures will be constructed, and may require some earthen fill.
- **Solar Array Installation** – The solar arrays are installed first by driving piles (including pre-drilling if required by site soil conditions). The tracker is then attached to the piles and then the PV modules (panels) are attached to the tracker. Generally, at the same time the substation equipment, inverters, and BESS are installed. This also includes running cables between all equipment. Cables between the PV panels and inverter are commonly routed through hangers or trays. Cables from the inverters to the substation will be underground (installed by trenching, laying the cable, and backfilling).
- **BESS installation** – Grade the pad, install the foundation, set the BESS and exterior electrical equipment, run conduit and wiring between the equipment, trench to the substation, and test/commission the BESS once the grid requirements have been met.
- **Gen-tie Construction** – Structure assembly and conductor installation will be performed from the Project substation to the Point of Interconnection (POI) at Walker River Substation.
- **Testing and Commissioning** – Testing of subsystems will be conducted as they are completed. Modules will be tested once all supporting subsystems are installed and tested.
- **Site Stabilization/Reclamation** – Disturbed areas will be stabilized during construction to minimize wind and water erosion and fugitive dust by watering and/or use of dust palliatives. Cleared and graded surfaces that will not be subject to future disturbance will be restored.

- **Demobilization** – Any temporary fabrication and construction facilities will be removed from the site once construction is complete.

7.3 Operations

O&M activities will begin once Project construction is complete and the facility has been commissioned. O&M activities associated with the Project will be minimal. The Project will be expected to collectively require up to 12 personnel, including both full-time employees and contractors throughout the operational life of the Project. Maintenance and administrative staff will typically work 8-hour days, Monday through Friday. During periods when non-routine maintenance or major repairs are in progress, the maintenance force could work longer hours, and contract labor could be utilized as necessary.

Long-term maintenance schedules will be developed to include periodic maintenance and equipment replacement in accordance with manufacturer recommendations. Solar panels are designed for a 40-year Project life; however, PV modules and BESS components will be replaced as necessary. Moving parts, such as motors and tracking module drive equipment will be serviced on a regular basis, and unscheduled maintenance will be conducted as necessary.

No heavy equipment will be used during normal plant operation. Operation and maintenance vehicles will include trucks (pickups, flatbeds, dump trucks), forklifts, and loaders for routine and unscheduled maintenance. Large heavy-haul transport equipment may be brought to the site infrequently for equipment repair or replacement.

Operation of the Project will only be expected to generate up to 10 to 15 round trips per day from maintenance and security personnel. Potable water may be supplied by the County (if service is available), a well, or could be stored on-site in a 15,000-gallon storage tank. Additional non-potable water tanks for fire department use may also be stored onsite per NFPA requirements.

O&M activities associated with the Project will require the use of standard traffic and safety signage on-site. Traffic and/or safety signs may be placed on the Project site as required to ensure safe use of the roadways and access to the facility. Traffic and safety signage will be maintained as part of the overall Project operation.

7.4 Project Decommissioning and Reclamation

The Project has an anticipated operational life of up to 40 years, after which the Project proponent may choose to update site technology and recommission, or to decommission the

site and remove the systems and their components. According to LCC § 15.336.12, the Project shall submit a reclamation plan ~~which, such plan~~ shall identify the life expectancy of the ~~P~~project and a decommissioning timeline with milestones. All decommissioning and restoration activities will adhere to applicable requirements of the appropriate governing authorities and in accordance with all applicable federal, state, and County regulations. At the end of the proposed Project site's operational term, the applicant may determine that the proposed Project site should be decommissioned and deconstructed, or it may seek an extension of its permits. Because the PV arrays' supporting equipment will sit on the surface of the land, the land will be largely unaltered from its natural state when the arrays are removed after the proposed Project's lifetime. The Applicant will work with the County to comply with the local regulations and requirements to ensure the decommissioning of the proposed Project site after its productive lifetime. The Project will use BMPs to ensure the collection and recycling of materials and to avoid the potential for modules and batteries to be disposed of as municipal waste.

The Project Decommissioning and Reclamation Plan is being included in the Final Planned Unit Development document as Appendix I. The plans outline the procedures and guidelines for responsibly decommissioning and reclaiming the ~~P~~project site once it has reached the end of its operational life. The plan is designed to ensure that all environmental considerations are addressed and that the site is restored to a condition that is safe and beneficial for the surrounding community.

Appendices*

Appendix A – PUD Justification

Appendix B – Project Legal Description and Vesting Deed

Appendix C – Soils Report

Appendix D – Property Tax Status

Appendix E – NV Energy Intent to Serve

Appendix F – BOCC Determination

Appendix G – Emergency Response Plan Example

Appendix H – NDOT-Reviewed TIS and Acceptance Letter

Appendix I – Decommissioning Plan

Appendix J – Landscape Plan

Appendix K – WRID Irrigation Letter