



STATE OF NEVADA  
STATE BOARD OF EQUALIZATION

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Governor

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Shellie Hughes  
Secretary

In the Matter of	)	
	)	
TOWNSITE SOLAR, LLC,	)	Case No. 24-184
	)	
Petitioner	)	
	)	
vs.	)	
	)	
CLARK COUNTY ASSESSOR,	)	
	)	
Respondent	)	
_____	)	

**NOTICE OF DECISION**

***Appearances***

Eric Huswick and Josh Hicks appeared on behalf of the Petitioner, Townsite Solar, LLC (Taxpayer).

David Denman and Thomas Walusek appeared on behalf of the Respondent, Clark County Assessor (Assessor).

***Summary***

The matter of the Taxpayer’s petition for review of a personal property valuation on the 2023-24 unsecured tax roll within Clark County, Nevada, came before the State Board of Equalization (State Board) for hearing on October 21, 2024, after due notice to the Taxpayer and Assessor.

**FINDINGS OF FACT**

1. The State Board is an administrative body created pursuant to NRS 361.375.
2. The parties hereto were given adequate, proper and legal notice of the time and place of the hearing before the State Board, and the matter was properly noticed pursuant to the Open Meeting Law at NRS 241.020.
3. The Taxpayer has the burden of proof under NAC 361.735.
4. The Taxpayer noted that the Assessor had utilized obsolescence from a market

study referenced in the 2024-25 Personal Property Manual, but the year being appealed is the 2023-24 tax year.

5. The Taxpayer asserted that their taxable value was \$293,000,000 compared to the modified assessed taxable value of \$369,741,985 set by the Assessor.
6. The Declaration of Costs received from the Taxpayer indicated that the total cost for the fixtures and equipment was \$531,238,486. After applying the cost index and percent good for the Personal Property Manual, the Assessor arrived at a value of \$531,504,106. However, the Assessor determined that this amount exceeded the full cash value and applied obsolescence of approximately 30.43% based on the Berkeley Lab Study. This resulted in a taxable value of \$369,741,985.
7. The State Board determined that the Taxpayer failed to meet their burden of proof.
8. The State Board found that Assessor's cost approach evidence was reasonable and credible and upheld the taxable value of \$369,741,985.
9. Any finding of fact above construed to constitute a conclusion of law is adopted as such to the same extent as if originally so designated.

#### **CONCLUSIONS OF LAW**

1. Taxpayer and Assessor are subject to the jurisdiction of the State Board.
2. The State Board has the authority to determine the taxable value of property in the State of Nevada.
3. The Taxpayer failed to meet their burden of proof regarding the property valuation.
4. The State Board determined that the cost approach utilized by the Assessor was the most appropriate and rejected the valuation provided by the Taxpayer.
5. The Assessor's cost approach valuation regarding the property was reasonable, credible, and adequately supported.
6. Any conclusion of law above construed to constitute a finding of fact is adopted as such to the same extent as if originally so designated.

#### **DECISION**

Based on the above Findings of Fact and Conclusions of Law and a preponderance of the evidence, the State Board denied the Taxpayer's petition.

BY THE STATE BOARD OF EQUALIZATION THIS 31 DAY OF January, 2025.



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Shellie Hughes, Secretary