



**March 3, 2015**

**NV ENERGY'S COMMENTS FOR THE  
CAISO EIM YEAR 1 ENHANCEMENTS**

**I. INTRODUCTION**

NV Energy hereby submits the following comments to the California Independent System Operator Corporation ("CAISO") with respect to the Energy Imbalance Market ("EIM") Year 1 Enhancements. NV Energy appreciates the opportunity to provide comments on this initiative for the CAISO's consideration.

**II. COMMENTS**

**A. Establishment of EIM Transfer Limits Using ATC**

NV Energy reiterates its previously-expressed support for the CAISO proposal with respect to establishment of the EIM Transfer limit using ATC. As NV Energy understands the proposal, the CAISO will look to the EIM Entity to report the ATC value, consistent with its approved methodology for identifying ATC in the EIM Entity's OATT, by T-40. The CAISO's dispatch model will respect the reported ATC limits in determining which EIM Participating Resources to dispatch to meet imbalance needs. If a Transmission Customer elects to modify their schedule after T-57 or other deadline specified in the EIM Entity's OATT, that customer would be subject to the FERC-approved imbalance provisions resulting in a change from that customer's Forecast Data submitted directly to the CAISO Base Schedule Aggregation Portal for the operating hour in question, which was used in the EIM Entity's Base Schedule and from which the CAISO assessed imbalances to the EIM Entity. NV Energy believes this approach will help maximize the transmission capacity available to the EIM subject to operating experience with the proposal.

In addition, NV Energy affirms the understanding expressed by PacifiCorp in its comments filed with the ISO on February 26, 2015. Specifically, PacifiCorp outlined the understanding between the CAISO and the EIM Entities concerning tagging of imports and exports and settlement of deviations. NV Energy incorporates by reference PacifiCorp's statement of this understanding.

NV Energy also echoes PacifiCorp's caution concerning handling of capacity differences on either side of an EIM interface. NV Energy encourages the CAISO to watch for such discrepancies and work with the EIM Entities to resolve any such circumstances should they appear in the marketplace.

**B. 15-Minute Bidding on Intertie Scheduling Points**

NV Energy strongly supports CAISO's decision to defer this proposal to Phase 2 of the initiative and intends to actively participate in the stakeholder process on this matter.

**C. Enhancement to the Resource Sufficiency Evaluation**

In its evaluation of resource sufficiency, the ISO proposes to develop a monthly probability for hourly imports and exports tagging different values. NV Energy does not agree that prior-month tagging data is representative of the probability of values for hourly imports and exports for the purposes of resource sufficiency evaluation. Prior-month tagging data does not represent the seasonal nature of transaction types and volumes in the EIM Entity BAA. We support the PacifiCorp that tagging data from a period much closer to real-time be used and refreshed on a rolling basis. NV Energy joins PacifiCorp in requesting that the ISO revise the details of this proposal, which could be done through its business practice manual.

In addition, NV Energy supports the ISO's proposal to also perform the resource sufficiency evaluation on the ISO's BAA.