



## **COMMENTS OF NV ENERGY ON EIM ENTITY READINESS CRITERIA**

### **CAISO STAKEHOLDER PROCESS**

**JUNE 24, 2015**

NV Energy fully supports the market readiness criteria developed to date through the ISO stakeholder process. It agrees with the ISO that the rigorous market systems build, integration, and testing that was set forth in the EIM Entity implementation project provides the fundamental tasks required for EIM Entity readiness. It also agrees with the stakeholders that the implementation project should be enhanced by incorporating lessons learned from PacifiCorp's implementation and operational experience and also the operational improvements developed as EIM Year 1 enhancements.

Since the Federal Energy Regulatory Commission directed the ISO and EIM Entities to develop and certify criteria demonstrating that an EIM Entity is ready to operate in EIM, NV Energy has worked closely with the ISO to ensure the implementation project is comprehensive and adequately prepares NV Energy for the EIM. It believes that the criteria developed, which reflect the preparations in advance of going live in EIM (that are more fully explained in documents the ISO has published for transparency purposes), is the appropriate threshold for market readiness that will prevent the EIM Entity's operations from undermining system or market operations across the EIM footprint.

NV Energy will work with the ISO on a certification attesting to its successfully completing its implementation project activity. NV Energy also anticipates pledging to defer its operational date if serious issues compromising operations in the ISO footprint arise at such a time that they cannot be adequately resolved before October 1, 2015.