

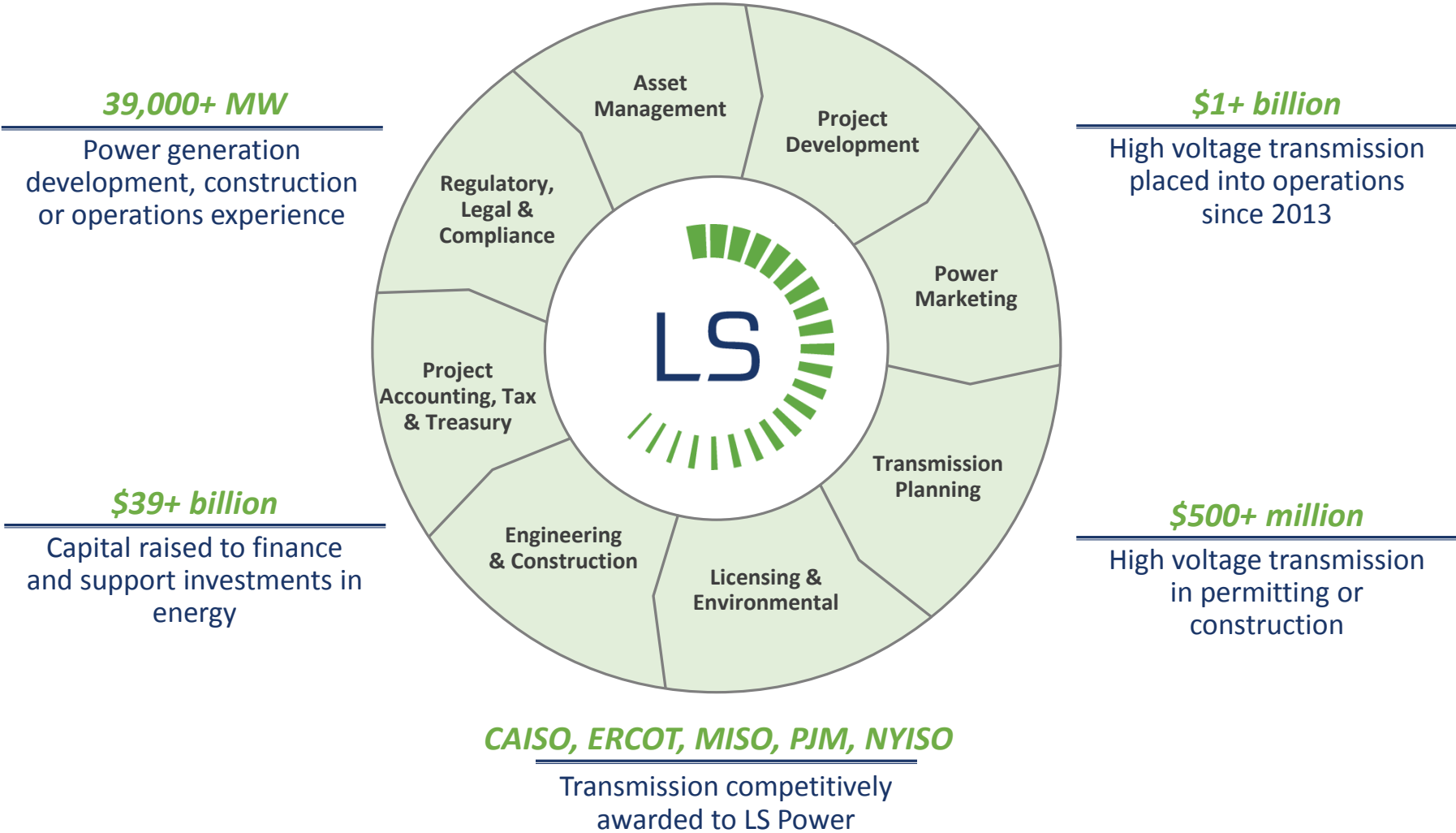
LS POWER



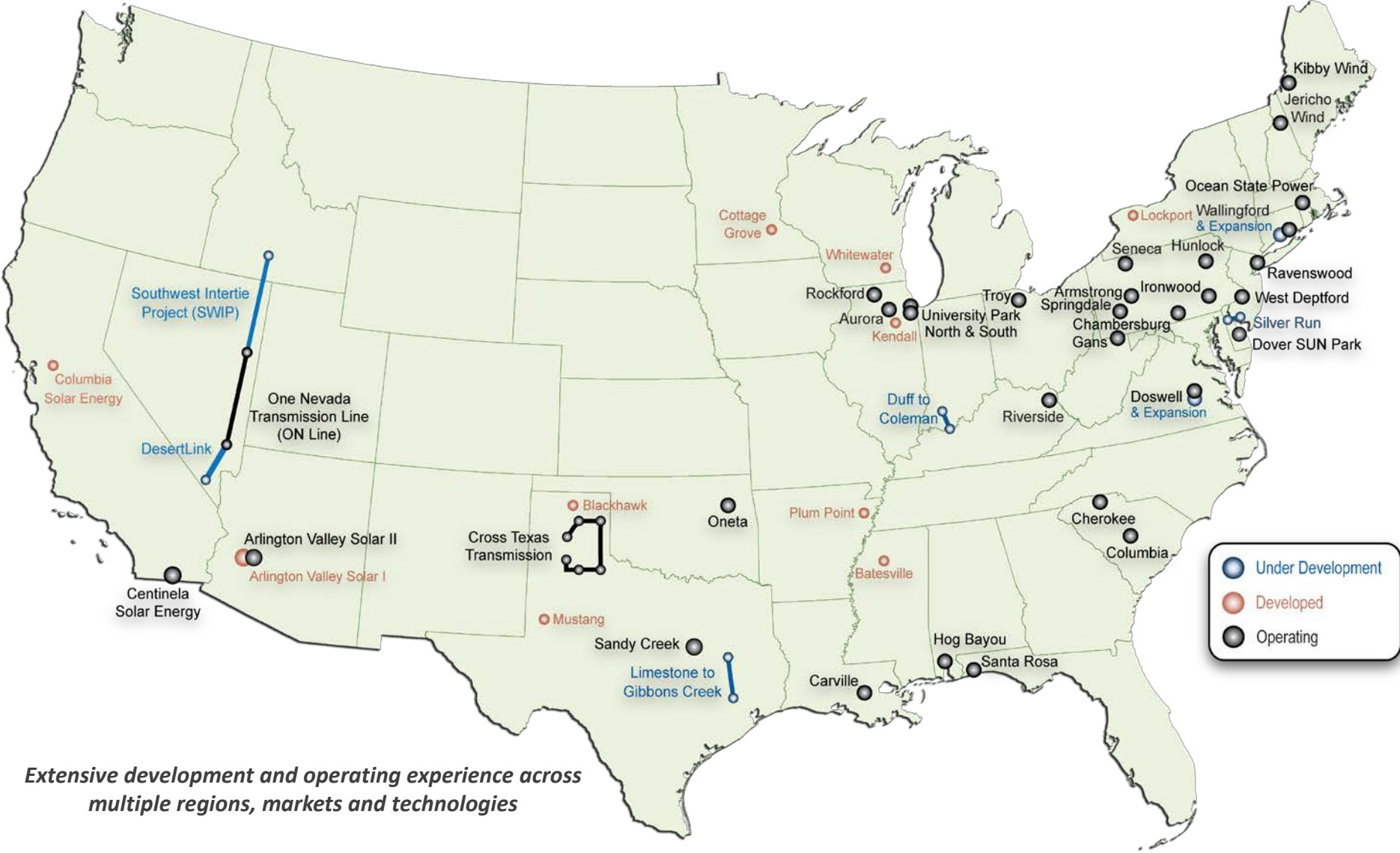
California ISO
June 18, 2018

LS Power

Power generation and transmission company formed in 1990



Project Portfolio



Extensive development and operating experience across multiple regions, markets and technologies

LS Power Transmission

One Nevada Transmission



Partnership with NV Energy

231 miles 500 kV transmission
8 miles 345kV transmission
EHV substation

\$500+ million construction cost

First connection between northern and southern Nevada

Cross Texas Transmission



Selected by PUCT

260 miles 345 kV transmission
4 EHV substations

\$500 million rate base

Public Utility in Texas

Silver Run Electric



Selected by PJM in first competitive process

3 mile 230 kV Delaware River crossing, EHV substation

\$146 million construction cost cap

Republic Transmission



Selected by MISO in first competitive process

31 miles 345kV transmission

\$58 million cost cap

Public Utility in Indiana

DesertLink



Selected by CAISO in a competitive process

60 miles 500 kV transmission

\$145.5 million construction cost cap

Limestone – Gibbons Creek

Partnership with Garland Power & Light

67 miles 345 kV transmission

\$200+ million construction cost



FRACMOO2: Eligibility Criteria, Counting Rules

- “Start-up” time as a qualification criteria for FMM & RT flexible capacity:
 - CAISO’s previous iteration of FRACMOO proposal had a start up time of “60 min”. Recent proposal removed this. Key issues to consider:
 - Presumption is that new Imbalance Reserve product will address the need for RT flexibility:
 - *Can Imbalance Reserve ensure required Capacity is “available”?*
 - *Flexible RA capacity → Planning Capacity*
 - *Imbalance Reserves → Operational Capacity*
 - *Market signals for flexible products?*
 - One of the key objectives of this initiative is to address Real Time Flexibility
 - Current Flexible RA framework shows sufficient Flex RA capacity available yet CAISO sees Operational challenges
 - Can procured Flex capacity be “accessed” in Real Time?
 - A long start resource can address real-time flexibility but is that the most optimal solution?
 - *Does this cause oversupply issues? Renewable curtailment? GHG goals?*
 - *Impact on reliability – CPS violations?*
 - *Economic impacts - Out of Market dispatch? Reliance on Reserves?*

FRACMOO2: Eligibility Criteria, Counting Rules *contd.*

- Counting rules
 - For Real-Time Flexible Capacity counting, storage is proposed to be limited to resource's instantaneous output:
 - *This will artificially block half of the capability of these resources*
 - *As currently proposed no difference between a generator and a storage*
 - *Inconsistent with counting rules for storage in Day Ahead*
 - *Should market optimize state of charge to unlock full capacity of storage resource from charge to discharge?*
- EFC separation from NQC
 - *Vital to unlock flexibility from some resources that can't otherwise qualify for NQC*