



**COMMENTS OF NV ENERGY
2018 DRAFT POLICY INITIATIVE ROADMAP
DATED DECEMBER 11TH, 2017
CAISO STAKEHOLDER PROCESS**

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NV Energy appreciates the opportunity to comment on the 2018 policy initiative roadmap and is supportive of the overall direction of the 2018 policy initiative roadmap.

I. NV Energy's Position

a. Proposed Addition

NV Energy proposes the addition of the Over/Under Scheduling Load Enhancements to the 2018 roadmap. While this initiative was proposed as an enhancement to the existing EIM, it also may need to be incorporated into the Extended Day Ahead Market (EDAM) initiative. For instance, should the Over/Under Scheduling Load Enhancements be eliminated altogether if an EIM Entity is participating in the EDAM? Currently, the Over/Under Scheduling Load Penalty does not penalize EIM Balancing Authority Areas if they balance to the CAISO load forecast, even in instances when the CAISO load forecast is outside the load scheduling penalty tolerances. Proposed changes to the Over/Under Scheduling Load Enhancements may be fairly simple, such as potentially eliminating any penalty when the CAISO load forecast accuracy is outside of the load scheduling tolerances.

b. Extending the Day Ahead Market

The CAISO stated, during the December 14th roadmap stakeholder call, that the Day Ahead Resource Sufficiency Evaluation will be determined per each state's resource adequacy requirements. However, three Day Ahead Market stakeholder initiatives that are either in progress or planned to be designed outside of the Extended Day Ahead Market are proposed to be rolled into the Day Ahead Resource Sufficiency Evaluation. NV Energy supports an appropriate Day Ahead Resource Sufficiency Evaluation in an extended market to ensure that Balancing Authority Areas are not leaning on each other. However, NV Energy is uncertain how the Day Ahead Resource Sufficiency Evaluation will be designed to establish requirements that are determined by each state. Moreover, it is important to design a resource sufficiency evaluation that will not impose additional requirements, ramping or capacity, on Balancing Authority Areas that would require resource procurement not needed to support their load profile.