



**COMMENTS OF NV ENERGY
2019 DRAFT THREE-YEAR POLICY ROADMAP AND ANNUAL PLAN
DATED SEPTEMBER 11TH, 2018
CAISO STAKEHOLDER PROCESS**

October 3, 2018

NV Energy appreciates the opportunity to comment on the 2019 three-year policy initiative roadmap and is supportive of the overall direction. In 2020, the roadmap identifies the beginning of the real time market and EIM refinements enhancements. However, the roadmap does not mention any detail about this initiative. NV Energy requests more information about the scope of this initiative. At a minimum, NV Energy advocates for the initiative to cover BAA Islanding of Internal Regions, Limiting EIM Energy Transmissions Scheduled Resources Transfers, and Over/Under Scheduling Load Enhancements. These catalog items could be combined into one initiative to cover EIM refinements enhancements.

CAISO has further stated that the real-time flexible ramping sufficiency test will be covered in a holistic review during the Extended Day Ahead Market (EDAM) Enhancements in the sufficiency test white paper. Additionally, there are limited enhancements that will be made prior to this initiative in the Business Practice Manual (BPM) Process, as these changes do not require tariff revisions. NV Energy is appreciative that CAISO is willing to make enhancements on a quicker timeframe, through revisions to the BPM, when possible; however NV Energy is very concerned that important changes to the current flexible ramp test will be unduly delayed if not pursued immediately on a more targeted basis. The EDAM will be an extremely large undertaking, requiring several years at best to design and implement. Customers should not be exposed to challenges resulting from well-recognized deficiencies in the currently-applicable flexible ramp test. There is not a proposed solution for the reliability issues that occur when locking the transfers at a fifteen minute solution rather than the real dynamic flow. Finally, NV Energy is concerned that there will not be sufficient time or space for a holistic real-time flexible ramping sufficiency test review in the EDAM initiative. CAISO has outlined six topics that will already be covered in the EDAM initiative, none of which is a holistic review of the real-time sufficiency test.