

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Metering Rules Enhancements stakeholder initiative Revised Straw Proposal posted on April 19 and as supplemented by the presentation and discussion during the stakeholder web conference held on April 26, 2016.

Submit comments to InitiativeComments@caiso.com

[Comments are due May 10, 2016 by 5:00pm](#)

The Revised Straw Proposal (and the draft SQMD Plan included as Attachment A) posted on April 19 and the presentation discussed during the April 26 stakeholder web conference may be found on the [Metering Rules Enhancements](#) webpage.

Please provide your comments on the four areas of the revised straw proposal listed below.

- (1) Provide existing metered entities the option to retain current requirements and maintain their status quo, or instead to opt for (2) and (3). The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

NV Energy approves of the option to allow entities to maintain existing metering arrangements. As an EIM Entity and EIM Participating Resource Scheduling Coordinator, NV Energy's metering arrangements with the ISO already reflect its status as an SCME and a combination of options 2 and 3. NV Energy submits SQMD for its load and resources. In advance of commencing EIM operations, it worked with the ISO to determine metering arrangements and implementation consistent with local regulatory requirements and satisfying data needs of the EIM. This

process produced a workable metering solution that is not yet ripe for re-evaluation or changes.

- (2) Allow scheduling coordinators the option to submit settlement quality meter data (SQMD) for scheduling coordinator metered entity (SCME) resources represented. The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

- (3) Require submittal of a SQMD Plan by scheduling coordinators opting to submit SQMD for SCME resources represented. A draft SQMD Plan was attached to the revised straw proposal. Topics addressed in the draft SQMD Plan include: responsibility, agreements, market participation, quality assurance, audits, and corrective actions. The ISO invites stakeholders to comment on the draft. The ISO is particularly interested in whether the draft SQMD Plan captures all relevant topics.

Based on recent experience establishing metering arrangements for EIM purposes, NV Energy finds that a combination of options 2 and 3 will result in the optimal, least burdensome, and most effective solution for most entities. A plan to ensure continued effectiveness of negotiated metering solutions does not seem unreasonable or burdensome on its face. NV Energy seeks more information on how frequently the ISO believes the metering plans should be audited or otherwise re-evaluated.

- (4) Modifications to ISO metered entity (ISOME) requirements. Tariff section 10.2.6 requires revenue quality meter data (RQMD) be provided to the ISO directly; however, the ISO may exempt an entity from this requirement if installation of communication links is unnecessary, impracticable or uneconomic. The ISO proposes to allow communication of meter data via any available method provided appropriate security and/or encryption of the data exists and is verified to be in place for the method chosen. The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

Other comments

Please provide any comments not associated with the four topics above.

Comments:

