



## Stakeholder Comments Template

### Hybrid Resources

This template has been created for submission of stakeholder comments on the Hybrid Resources Issue Paper that was published on July 18, 2018. The paper, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/HybridResources.aspx>

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **August 13, 2019**.

Submitted by	Organization	Date Submitted
Lindsey Schlekeway (702) 402-1847	NV Energy	August 13, 2019

**Please provide your organization’s comments on the following issues and questions. For all topics please explain your rationale and include examples if applicable.**

NV Energy (“NVE”) appreciates the opportunity to submit stakeholder comments regarding the “Hybrid Resource Issue Paper.”<sup>1</sup>

#### 1. Interconnection

Please provide your organization’s feedback on the interconnection topic as described in section 3.2.

No comments at this time.

#### 2. Forecasting and Operations

Please provide your organization’s feedback on the forecasting and operations topics as described in section 3.3.

<sup>1</sup> Hybrid Resources Issue Paper, July 18, 2019

No comments at this time.

### 3. Markets and Systems

Please provide your organization's feedback on the markets and systems topics as described in section 3.4.

NVE has identified *stranded capacity*<sup>2</sup> under the multiple resource ID configuration as the largest issue that would have an impact on hybrid resources within the Energy Imbalance Market ("EIM").

An example of this problem is when the approved capacity allocated to a project in the generation interconnection agreement is less than the total combined output of the hybrid resources' capacity. This leads to *stranding assets*<sup>3</sup> under the current framework from the California Independent System Operator ("CAISO") which could decrease market participation of this resource type within the EIM. Therefore, it is imperative to develop a solution.

In conclusion, NVE encourages the CAISO to move forward with the hybrid resource constraint theory to resolve this issue. NVE is interested in CAISO's analysis and the potential market implications of implementing the proposal within the EIM.

### 4. Ancillary Services

Please provide your organization's feedback on the ancillary services topic as described in section 3.5.

No comments at this time.

### 5. Deliverability

Please provide your organization's feedback on the deliverability topic as described in section 3.6.

No comments at this time.

### 6. Resource Adequacy

Please provide your organization's feedback on the resource adequacy topic as described in section 3.7.

No comments at this time.

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<sup>2</sup> Emphasis added

<sup>3</sup> Emphasis added

**7. Metering, Telemetry and Settlements**

Please provide your organization's feedback on the metering, telemetry and settlements topics as described in section 3.8.

No comments at this time.

**8. Additional comments**

Please offer any other feedback your organization would like to provide on the Hybrid Resources Issue Paper.

No comments at this time.