

Supplemental Comments of NV Energy:

To clarify, NV Energy does not oppose the proposed tariff amendment to withdraw the T-30 base schedule functionality and retain the T-40 submission window. As noted in the CAISO's June 15th presentation, testing has demonstrated that the change to T-30 is not feasible. The tariff must be made to conform to this reality.

As noted in NV Energy's initial comments; however, retention of the T-40 submission window has consequences -- the nodal process for determining the flexible ramp product and the use of the Mosaic calculation means the advisory calculation is not complete until T-75 and the final calculation is completed at T-55, adding another layer of difficulty in passing the tests.

Accordingly, NV Energy greatly appreciates CAISO's commitment to work with NV Energy and all stakeholders to better understand concerns over the newly implemented net-load uncertainty tool, and to further analyze whether the observed variability reflects uncertainty that actually materializes and will consider necessary changes after the evaluation is complete. We agree that addressing these important issues on a timely basis as part of the continuing refinements to the resource sufficiency test is the best course.