



**COMMENTS OF NV ENERGY  
2019 DRAFT POLICY INITIATIVE CATALOG  
DATED AUGUST 8<sup>TH</sup>, 2018  
CAISO STAKEHOLDER PROCESS**

**August 22, 2018**

NV Energy appreciates the opportunity to comment on the 2019 policy initiative catalog and is supportive of the overall direction of the 2019 policy initiative catalog.

**I. NV Energy's Position**

**a. Submissions Precluded: Energy Transfer System Resources (ETSR)  
Ramping Profiles during Contingencies**

NV Energy does not support eliminating the proposed real time sufficiency test initiative from the 2019 draft catalog. As stated in the EIM Offer Rules August 2<sup>nd</sup> comments, NV Energy has concerns with including this initiative in other stakeholder initiatives. Doing so, unnecessarily delays the resolution of reliability concerns identified by NV Energy and other EIM Entities. Further, it fragments the stakeholder initiative rather than analyzing the entire resource sufficiency test for potential improvements.

**b. Support and Proposed Priority**

NV Energy supports the following stakeholder initiatives as its top priorities for 2019. The initiatives are prioritized in order of highest priority first.

1. **Hourly Resource Sufficiency Evaluation:** As stated above, this initiative should have its own dedicated stakeholder initiative to focus on meaningful and needed enhancements to this real time test. NV Energy strongly recommends that the CAISO honor its prior commitment of addressing the real-time flexible ramp sufficiency test as part of the 2018 Final Policy Initiatives Roadmap<sup>1</sup>. Reliability concerns with the current market solution warrant the CAISO addressing this issue in a timely manner and as a standalone initiative. It seems inappropriate for the CAISO to unilaterally defer this initiative given the existing reliability concerns, in addition to the level of stakeholder engagement and support surrounding the real-time flexible ramp sufficiency test initiative.
2. **BAA Islanding of Internal Regions:** This EIM initiative is important when an EIM Entity BAA divides into separate regions during a transmission outage. Currently, there is no market mechanism to handle such an occurrence.
3. **Limiting EIM Energy Transmission Scheduled Resources Transfers:** The inter-interval changes to the EIM dynamic transfer issue also occurs during failures of the real time



flexible ramping sufficiency test. Therefore, this initiative should be prioritized as a high priority due to the potential to cause reliability issues.

4. Over/Under Scheduling Load Enhancements: This initiative remains a high priority for NV Energy. The over/under scheduling enhancements could be combined with another EIM specific initiative.
5. Flexible Ramping Product Enhancements: CAISO should consider opening a stakeholder initiative in the near future to analyze the effectiveness of the flexible ramping product since implementation Fall 2016.
6. Extended Pricing Mechanisms: In 2018, CAISO prioritized initiatives that reduce the reliability issues from the duck curve ramp. Therefore, CAISO should consider a stakeholder initiative that would focus on pricing within the market. The extended pricing mechanisms may or may not be appropriate for the CAISO market, nevertheless a study should be conducted to determine whether market prices appropriately reflect the needed energy during times of needed ramp.

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<sup>1</sup> CAISO. 2018 Final Policy Initiatives Roadmap.

<http://www.caiso.com/Documents/2018FinalPolicyInitiativesRoadmap.pdf>. Page 11.

