



**COMMENTS OF NV ENERGY
ISSUE PAPER/ STRAW PROPOSAL
EXTENDED SHORT-TERM UNIT COMMITMENT
DATED MAY 15, 2018
CAISO STAKEHOLDER PROCESS**

May 29, 2018

NV Energy appreciates the opportunity to comment on the extended Short Term Unit Commitment (STUC) straw proposal and understands that this stakeholder initiative will be under a much quicker timeline for implementation. Nonetheless, the CAISO should consider fully the consequences of any market design. For example, whether the extended STUC horizon could impact costs, including the bid cost recovery (BCR) uplift. Therefore, NV Energy proposes that CAISO provide market analysis on the potential uplift impacts.

With respect to non-participating, third-party customers taking service under the OATT, the CAISO should clarify that nothing in the modified STUC optimization will have financial consequences. Under Section 4.2.4.5 of Attachment P of NV Energy's OATT, Transmission Customers submit their initial Transmission Customer Base Schedules seven days prior to the Operating Day and an update by 10 a.m. of the day before the Operating Day. These submissions do not have financial consequences. Only the final Transmission Customer Base Schedules at 57 minutes prior to the Operating Hour is financially binding.