



**COMMENTS OF NV ENERGY
MARKET SETTLEMENT TIMELINE
ISSUE AND STRAW PROPOSAL
DATED JUNE 11, 2019**

June 27, 2019

NV Energy appreciates the opportunity to comment on the CAISO's Issue and Straw Proposal for the Market Settlement Timeline stakeholder initiative. In general, NV Energy supports the direction of the CAISO's Settlement Timeline proposals but is concerned with the proposed tight deadline for the initial meter data submission. NV Energy submits these comments in support of CAISO's overall objective with a counter proposal to meet this objective without the metering concern.

I. Proposed T+4 Meter Data Submission

CAISO proposes to eliminate the initial settlement statement that is published three business days after the trade date. The overall objective is to lower the statement swings between settlement statements, by moving the initial settlement statement after the market price correction timeline and after the initial meter data submission timeline. NV Energy supports this objective and agrees with CAISO that moving the initial settlement statement timeline would result in an overall market benefit.

Additionally, CAISO proposes to reduce the initial meter data submission from eight business days after the trade date to four business days after the trade date. This proposed meter data submission timeline is problematic for NV Energy. This expedited timeline may at times result in an increase in estimated meter data that is submitted and utilized in the initial settlement statement. Resulting in a less accurate initial settlement statement than the current twelve business day settlement statement. On the occasions when this occurs, market participants would essentially lose a disputable settlement statement period for charge codes that require the meter data for a correct calculation. Additionally, this would result in settlement statement swings that the CAISO is aiming to prevent.

II. NV Energy's Proposal

NV Energy proposes to push the initial settlement statement back to nine business days from the trade date. This would allow market participants to submit meter data six business days after the trade date. This additional time would reduce the instances that meter data would need to be estimated, which results in a more accurate initial settlement statement. In addition, NV Energy believes this proposal complies with FERC Order 741 as invoicing and payment timelines remain unchanged.



FERC Order 741 states:

“In this Final Rule, the Commission adopts the NOPR proposal to direct each ISO and RTO to submit a compliance filing that includes tariff revisions to establish billing periods of no more than seven days and settlement periods of no more than seven days after issuance of bills.”¹

FERC Order 741 specifies the definition of the billing and settlement periods:

“Some parties sought clarification of the Commission’s definition of “settlement cycle” in the NOPR, recognizing that settlement encompasses both the billing period and the additional time for final payment of the billed amount. The Commission will therefore refer to each period separately as the “billing period” and the “settlement period.”¹

III. Initial Statement Dispute Period

CAISO does not propose to change the initial settlement dispute period, which currently resides at fourteen business days after the initial settlement statement. NV Energy proposes to extend this settlement dispute period to twenty two business days from the initial settlement statement. This proposed dispute period would align with all the remaining dispute periods after each settlement statement is published. Moreover, this extended dispute period would provide market participants additional time to research market outcomes for meaningful disputes.

In conclusion, NV Energy supports the overall objective of this stakeholder initiative but proposes slight changes to the original proposal to mitigate concerns.

¹ FERC. October 21, 2010 Docket No. RM10-13-000. <https://www.ferc.gov/whats-new/comm-meet/2010/102110/E-3.pdf>