



**COMMENTS OF NV ENERGY
THIRD REVISED DRAFT FINAL PROPOSAL
EIM GREENHOUSE GAS ENHANCEMENTS
DATED APRIL 25, 2018
CAISO STAKEHOLDER PROCESS**

May 23, 2018

NV Energy is supportive of the overall direction of the third revised draft final proposal for the EIM greenhouse gas enhancements. We appreciate the efforts of the CAISO Staff in addressing the numerous issues encompassed in this initiative.

CAISO proposes to eliminate the minimum bid price that was proposed in the second revised draft final proposal. NV Energy fully supports the third revised draft final proposal in light of this change. Additionally, CAISO plans to continue with the proposal to limit the GHG bid quantity between the EIM participating resource's base schedule and upper economic limit. NV Energy supports this proposal as it specifies the capacity that is not being used to count towards an internal RPS standard. Finally, NV Energy agrees with CAISO that this proposal should improve the accuracy of the GHG attribution and reduce the magnitude of the secondary dispatch issue.