

COMMENTS OF NV ENERGY ON ALISO CANYON PHASE 2 DRAFT TARIFF PROPOSAL CAISO STAKEHOLDER PROCESS

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NV Energy does not object to the ISO proposal to extend beyond November 30, 2016 the interim measures, effective June 1, 2016, to address the Aliso Canyon gas storage field constraints. Nor does NV Energy object to the refinements that the ISO has proposed for certain of the tariff provisions in question.

NV Energy is highly supportive of the minor change to the tariff provision section 30.11, which change will allow for all types of default energy bids to be eligible to seek after-the-fact cost recovery from FERC should the market prices fail to cover intra-day fuel price volatility. The prior limitation of that provision to Variable Cost Option default energy bids, only, made an unwarranted distinction among the way the default energy bid is calculated or determined. NV Energy agrees that the distinction should be removed, and that all default energy bid types should be eligible for seeking after-the-fact cost recovery from FERC in the appropriate circumstances, and appreciates the ISO's identifying and requesting this change. NV Energy looks forward to actively participating in a future stakeholder initiative related to cost recovery mechanisms mentioned in the ER16-2445 tariff filing.