COMMENTS OF NV ENERGY
ALISO CANYON PHASE 3
DATED JUNE 2, 2017
CAISO STAKEHOLDER PROCESS

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NV Energy appreciates the opportunity to comment on the Aliso Canyon Phase 3 CAISO Stakeholder Process. The ISO proposes to temporarily extend the Aliso Canyon enhancements beyond the November 2017 sunset date and to permanently enhance the entire Real Time Market with a few of the Aliso Canyon mitigation measures. One of the tools created to manage reliability issues from the Aliso Canyon storage facility was the gas constraint tool. NV Energy is supportive of the ISO's proposal to extend this tool permanently to the entire ISO footprint and the EIM. This tool should provide market participants another option to communicate and manage reliability issues from physical gas pipeline limitations. However, NV Energy requests more clarification about the gas constraint overall process, as well as, potential market impacts. Specific questions are listed below:

1. *Requirements/ Documentation:* Will there be requirements for enacting the constraint? What sort of documentation will be needed to enact the constraint?
2. *Notice/ Timeframe:* How much advance notice is needed to notify the ISO of the gas constraint? Should this be handled initially as a prediction of gas limitations and later enacted when the conditions occur? Is there a preferred timeframe to use this tool?
3. *Bid and Base Schedule Submission:* What is the appropriate way to handle EIM bids and base schedules? Should market participants leave bids in place for the constrained resources? Will the constrained resources be limited to the submitted base schedule or a different value specified by the Entity?
4. *Flex Ramp Sufficiency and Capacity Test:* Once constrained is the entire resource removed from providing flex sufficiency and capacity? Will only one side of the resource, in the direction of the constraint, be removed? For example, if there is a shortage of gas, can the constrained resource count towards the requirement for downward capacity and flex ramp?
5. *Power Balance Infeasibilities:* If a constrained resource causes a power balance infeasibility, will the infeasibility be handled differently?
6. *Settlements:* How will the gas constrained resource be settled? At the constrained LMP?