



**COMMENTS OF NV ENERGY ON THE MARKET ENHANCEMENTS
FOR SUMMER 2021 READINESS (Wheel-Through Transactions)**

FINAL PROPOSAL - DATED MARCH 19, 2021

April 2, 2021

NV Energy

NV Energy appreciates the opportunity to comment on the CAISO's Final Proposal. While the CAISO has attempted to address the concerns of Southwestern entities, the Final Proposal continues to modify the priorities for wheel-through transactions in a manner that is unduly discriminatory and inconsistent with FERC's long-standing open access transmission principles as reflected in the terms and conditions of the *pro forma* Open Access Transmission Tariff (OATT) the Commission established in Order No. 888. NV Energy understands the CAISO's desire to strike an improved balance between wheel-through transactions imported and exported on firm transmission and procurement by California load serving entities (LSEs) to meet resource adequacy requirements established by CAISO and the California Public Utilities Commission. This proposal goes too far in favor of the California LSEs to the detriment of customers in Western Balancing Authority Areas who require transmission through California.

The CAISO is acting to foster deliberate, economic choices made by California regulators and LSEs not to secure resource adequacy import capacity on firm transmission in contravention to the OATT requirement for external designated network resources, the CAISO's own recommendations, and the requirements of other FERC-jurisdictional Regional Transmission Organizations and Independent System Operators.

In a filing made just two months before the summer, the CAISO unilaterally imposes changes that can have a significant impact throughout the region. The CAISO's proposal devalues daily, weekly, and even monthly firm transmission service procured after the date of the CAISO's filing under the OATTs of other Western transmission providers. This can interfere with the ability for non-California Balancing Authorities, including NV Energy, to respond to unplanned outages or unexpected load demands and to meet their customers' needs in an economic and reliable manner.

NV Energy respectfully urges the CAISO to abandoned this unsustainable proposal and to prepare a compromise that respects firm transmission procured under competitive open-access principles through all time frames including monthly, weekly, and daily transactions and minimizes the risks to all western balancing authority areas. NV Energy understands that the CAISO proposes to limit this approach for the Summer of 2021. However, many if not all of the Western Balancing Authority Areas have the same short-term concerns and equal responsibility for their native load and third-party transmission customers. NV Energy must provide firm transmission service to any wheel-through transmission customers or exports going from Nevada into California. The West should operate under a consistent set of principles that do not discriminate against or modify the regional paradigm of open access transmission.