



**COMMENTS OF NV ENERGY
DAY-AHEAD MARKET ENHANCEMENTS
PHASE 1 THIRD REVISED STRAW PROPOSAL
DATED FEBRUARY 28, 2019
CAISO STAKEHOLDER PROCESS**

March 21, 2019

NV Energy appreciates the opportunity to comment on the CAISO's Second Revised Straw Proposal for the Day-Ahead Market Phase 1 Enhancements. NV Energy is supportive of all the 15-minute scheduling granularity changes proposed by CAISO. These enhancements should increase the scheduling accuracy to reduce large net load ramps within the hour. Additionally, NV Energy is very supportive of the regulation energy change to settlements that was proposed by the Sacramento Municipal Utility District (SMUD). This change will appropriately remove all uninstructed energy that occurs from resources responding to manage the Balancing Authority Area Control Error and frequency. Additionally, the settlement uplift calculations will become more accurate by removing uninstructed energy that occurs for reliability operations.

NV Energy notes that the 15-minute Day Ahead Scheduling Granularity Revised Straw proposal will require modification of the Open Access Transmission Tariffs (OATTs) of the EIM Participating Entities. The tariffs now reference the existing 10:00 AM deadline for submission of schedules. If the CAISO moves to 9:30 AM as proposed, the OATTs will need to be amended. Additionally, the OATTs may need additional revisions to allow the option for 15-minute scheduling. NV Energy requests that the EIM Entity OATT amendments be coordinated with the CAISO tariff amendment for this market enhancement. It will be necessary for the CAISO tariff to be approved with ample time for the EIM Entities to file OATT amendment changes with FERC.

In addition to the tariff changes, moving to 15-minute scheduling will require system modifications for more granular supplier offers from the EIM Participating Resource Scheduling Coordinators and for the Base Schedule submissions of the EIM Entity Scheduling Coordinator and their third-party customers. Sufficient time must be included in the implementation schedule for these system upgrades. As this market enhancement will require a large collaborative effort to successfully implement these system changes, NV Energy requests that the CAISO provide a minimum of 60 days for the operational users to test this functionality before implementation.