



**COMMENTS OF NV ENERGY  
REAL TIME NEUTRALITY SETTLEMENT  
DRAFT FINAL PROPOSAL**

**June 13, 2019**

NV Energy appreciates the opportunity to comment on the Draft Final Proposal of the Real Time Neutrality Settlement and offers these comments on the three ETSR options provided by CAISO. In the Draft Final Proposal, the CAISO has proposed three options to clarify submission of ETSR schedules with 5-minute granularity:

1. RTD EIM Transfer Schedules are deemed delivered.
2. EIM BAA with ETSR tagging responsibility, submits ALL ATF EIM Transfer Values (MW) to Settlements through EIM Real Time Interchange Schedule. These values should be shaped to reflect RTD ETSR Dispatches.
3. Current tagging requirements remain in effect. Settlement shapes the submitted ETSR ATF values to reflect RTD ETSR Dispatches.

NV Energy supports Option 1. It is the simplest option to settle everything within the Balancing Authority. Option 3 could be an acceptable alternative. NV Energy opposes Option 2, because this option would add additional complexity to the after-the-fact ETSR submissions, without adding any benefit over Option 1.