

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

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NV Energy appreciates the opportunity to comment on the Aliso Canyon Phase 2 Draft Tariff Language and proposes the below tariff revisions to include all types of Default Energy Bids to apply for after-the-fact cost recovery. The ISO proposed these temporary tariff revisions would extend to all Default Energy Bid calculations, and not only those that are under the Variable Cost Option Default Energy Bids. In addition, NV Energy understood from the proposal that the right of after-the-fact cost recovery would extend to all forms of mitigation using the Default Energy Bid, either that imposed as a bid cap – such as it is for NV Energy – or that imposed only during times of binding constraints. NV Energy therefore requests a revision to the tariff proposal to allow participants that are required to bid at or below the Default Energy Bid – any type of Default Energy Bid – to file for after-the-fact cost recovery to retrieve production costs.

“30.11 Filings with FERC to Recover Actual Marginal Fuel Procurement Costs

If a Schedule Coordinator (including an EIM Participating Resource Scheduling Coordinator) incurs but cannot recover through the Bid Cost Recovery process any actual marginal fuel procurement costs that exceed (i) the limit on Bids for Start-Up Costs set forth in Section 30.7.9, (ii) the limit on Bids for Minimum Load Costs set forth in Section 30.7.10, or (iii) the limit on Bids for Transition Costs set forth in Section 30.4.1.1.5, (iv) the incremental fuel cost calculated ~~under the Variable Cost Option~~ for all Default Energy Bids types as set forth in Section 39.7.1.1.1, 39.7.1.2, and 39.7.1.3 or (v) the incremental fuel cost calculated for Generated Bids as set forth in Sections 30.7.3.4, 39.7.1.1.1, and 40.6.8, the Scheduling Coordinator for the resource may seek to recover those costs through a FERC filing made pursuant to Section 205 of the Federal Power Act.”