

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

Nevada Power Company

Docket No. ER15-1196-005

**COMMENTS OF THE WESTERN POWER TRADING FORUM  
TO THE NEVADA POWER COMPANY'S TARIFF FILING**

Pursuant to Rules 211, 212, and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the "Commission"),<sup>1</sup> the Western Power Trading Forum ("WPTF") submits these comments in response to Nevada Power Company's and Sierra Pacific Power Company's, collectively d/b/a NV Energy, proposed revisions to their joint Open Access Transmission Tariff ("OATT").<sup>2</sup> The OATT revisions proposed by NV Energy ("NV Energy Tariff Filing") are in response to the California Independent System Operator's ("CAISO") tariff mechanism to automatically recognize and account for capacity the EIM Entity Balancing Authority Area has available to maintain reliable operations (the "Available Balancing Capacity Mechanism"). The Available Balancing Capacity Mechanism was approved by the Commission on December 17, 2015 ("Available Balancing Capacity Order").<sup>3</sup>

**I. COMMENTS.**

WPTF appreciates the efforts of NV Energy to address WPTF's concern that resources might be involuntarily counted as part of the Available Balancing Capacity Mechanism.<sup>4</sup> In

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<sup>1</sup> 18 C.F.R. § 385.211, *et seq.* (2010).

<sup>2</sup> *Nevada Power Company*, OATT Revisions Attachment P Schedule 9 and Definitions, Docket No. ER15-1196-005 (filed January 4, 2016) ("NV Energy Tariff Filing").

<sup>3</sup> *Federal Energy Regulatory Commission*, Order on Compliance Filing, Docket No. ER15-861-006 (issued December 17, 2015).

<sup>4</sup> *Western Power Trading Forum*, Comments and Protest to the Nevada Power Company Compliance Filing, Docket No. ER15-1196-004, filed September 22, 2015 (WPTF's Protest).

response to WPTF's concerns, NV Energy has modified the definition of Balancing Authority Area Resource ("BAA Resource"). The modified definition is intended to ensure, via tariff language, that no third-party is obligated to act as a BAA Resource, and be dispatched by the EIM, without the existence of an underlying voluntary, contractual relationship. WPTF appreciates NV Energy's willingness to work on this language and propose an amenable solution and believes that the changes made to the definition of BAA Resource will ensure that no third party resource is involuntarily counted as a BAA Resource. Therefore, WPTF supports the proposed change.

WPTF had also expressed concerns that the Available Balancing Capacity Mechanism could inappropriately count and compensate third party resources.<sup>5</sup> The Available Balancing Capacity Order made clear that compensation is a contractual matter between the resource and the EIM Entity.<sup>6</sup> NV Energy's Tariff Filing further clarifies that, "*NV Energy could only designate EIM Available Balancing Capacity up to the amount specified in the contract.*"<sup>7</sup> Therefore, WPTF understands that all contractual issues associated with the counting and compensation of BAA Resources will be addressed through the voluntary contractual agreement between the resource and NV Energy. WPTF supports this approach.

With NV Energy's modification to the definition of BAA Resource and the clarifications provided in the Available Balancing Capacity Order, WPTF supports the proposed NV Energy Tariff Filing to implement the Available Balancing Capacity Mechanism within the NV Energy OATT.

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<sup>5</sup> *Id.*

<sup>6</sup> Available Balancing Capacity Order at P. 67.

<sup>7</sup> NV Energy Tariff Filing p.13.

## II. CONCLUSION

WPTF respectfully asks the Commission to consider these comments in support of the tariff language proposed by NV Energy.

Respectfully submitted,



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**WESTERN POWER TRADING FORUM**

January 25, 2016

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the *Comments of the Western Power Trading Forum to the Nevada Power Company's Tariff Filing* on all parties of record in proceeding **ER15-1196-005** by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on January 27, 2016, at Woodland Hills, California.

  
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Michelle Dangott

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