

CDWR's Comments to CAISO's on Data Release Phase 3 Straw Proposal

CDWR appreciates CAISO's initiative to release additional data that will enable market participants to better understand market results and participate more effectively in the ISO markets. CDWR also appreciates CAISO's decision to allow market participants to post questions and comments regarding the CAISO's Data Release Phase 3 Straw Proposal.

Section 7.1.1

CDWR welcomes CAISO's decision to post the Day-Ahead (DA) Load Distribution Factors (LDF) and DA and Real-Time (RT) shift factors. CDWR is also interested in the RT LDF data and recommends that CAISO posts RT LDF as part of the Data Release Phase 3 initiative.

Section 7.1.3

In Phase 1, CAISO released the definition of each constraint without releasing the constraint's transmission limit data. CDWR considers the definition of a constraint is useless without the constraint's transmission limit and recommends that CAISO posts the transmission limit for each constraint.

Section 7.1.4

Currently the CAISO's OASIS posts transmission limits for constraints over the Interties. CDWR considers that CAISO should post the transmission limits for DA and RT constraints located within the CAISO's balancing authority since the internal constraints provides very useful information for LMP forecasting and congestion assessment. CDWR considers that the transmission de-rates need to be posted as well as part of the Data Release Phase 3.

CDWR suggests that CAISO revises and improves the readability of the transmission outages report published at the following directory: <https://www.caiso.com/transout/> as follows:

- The resource name needs to be more specific,
- Instead of using the From bus/To bus terminology, CAISO should use the Common Information Model (CIM) identifier that is in the augmented PTI version 26 raw file that is published as part of the CRR Full Network Model (down to the Pnode level).

If you have any questions please contact Daniel Cretu at (916) 574-0658.