

## Stakeholder Comments Template

### Data Release Phase 3 -- Comments

Submitted by	Company	Date Submitted
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DC Energy appreciates the ability to present comments on the Data Release Phase 3 Straw Proposal as presented on the February 8<sup>th</sup> Stakeholder Conference Call. DC Energy, in general, supports the CAISO staff in their efforts to increase transparency through additional data release as well as through a defined process how new requests for additional data transparency will be dealt with. However, DC Energy requests, as suggested on the February 8<sup>th</sup> call, that CAISO accelerate the submittal of the final proposal to the CAISO Board of Governors to its March rather than May 2011 meeting. Phase 3 is comprised of four major components (i.e., additional public data to be posted; market data comparable timing; CRR Bid Data Tariff Clarification; and release of wind and solar forecasting data) and DC Energy has comments on each such section.

#### Additional Public Data Posting

CAISO has identified an appropriate list of additional data to include in its public posting section of its web site but additional data items plus clarity on some suggested by CAISO is also appropriate and beneficial to transparency that fulfills a basic tenet of competitive markets. The additional market model data CAISO proposes to release includes (a) load distribution factors; (b) shift factors; (c) Nomograms and monitored constraints; (d) Transmission limits; and (e) Generation Outages. DC Energy has several suggestions on part (d) -- and in addition to describing them below, has also attached a spreadsheet detailing these suggestions.

First, regarding the existing Transmission Outage Reports, DC Energy requests that CAISO add several fields that provide more information about the nature of the outage, including: (i) equipment status (i.e., indicating whether a piece of equipment is actually taken out of service, or just being worked on 'hot'), (ii) the start hour and end hour for the scheduled work (not just the dates), (iii) a "reason code" (e.g., "Forced", "Upgrade", "Congestion Management"). We are pleased to see the ISO include the "From Bus" and "To Bus" though have some concerns if these are generic names (rather than unique IDs) as we suggest CAISO ensures that this data is consistent and 'map-able' to other CAISO location publications such as prices, CRR models, etc. Additionally, longer lead times are necessary for posting outages.

Second, DC Energy requests that CAISO publish a report that provides a snapshot of the

actual equipment that is out of service – and requests it is updated in near real-time (i.e., at least hourly). This second report provides critical additional detail that the existing Transmission Outage Report may not provide – on two dimensions: (i) it would necessarily cover all equipment that is out-of-service, not just that which has been scheduled, and (ii) it would provide an unambiguous snapshot of what was actually out-of-service (given that there could be some uncertainty regarding whether a particular outage actually occurred as scheduled). Other ISO/RTOs provide this data by effectively posting a snapshot from their real-time energy management systems.

Third, DC Energy requests that CAISO publish information about its limit conforming practice (i.e., situations where CAISO has chosen to utilize a different limit than the actual thermal limit in order to coax a particular market result that is more reflective of what it believes it should be). It is important to publish this data so that market participants have transparency into the drivers or non-drivers of market events. DC Energy suggests that the report include the date, interface name, thermal limit, and conformed limit for each limit conforming instance.

DC Energy continues to advocate that transparency has multiple benefits to the CAISO market including the fact that data availability is a key issue for market liquidity (i.e., least-cost, security-constrained economic dispatch provides opportunity for participants to forecast prices based on expected future states of the market and access to data is a key limiting factor for increasing confidence in forecasting) as well as public market monitoring. As participants are able to access data in its quest to understand dispatch results, sometimes anomalies are discovered that could be shared with ISO/RTO market monitoring personnel.

#### Market Data Comparable Timing

DC Energy recognizes the advancement CAISO implemented in the Summer of 2010 on its OASIS for trading hub pricing that reduced the time lag delta between ADS and OASIS posting to 30 seconds, however DC Energy strongly suggests there should never be any delay/lag between when one market participant has access to data then any other market participant. This puts one participant (or group of participants) at a significantly commercially advantageous (or disadvantage) position compared to others on exchange traded products. Therefore DC Energy requests CAISO eliminate any lag between ADS and OASIS data posting.

#### CRR Bid Data Tariff Clarification

DC Energy has, for over a year, suggested that CAISO is required to post CRR bid data consistent with the requirements included in FERC Order 719. DC Energy also understands that a CAISO Tariff clarification is required. During the current stakeholder process, posting CRR data has not been a controversial issue and DC Energy requests that CAISO move forward expeditiously to fully conform to such FERC Order. To that end DC Energy requests staff bring the Phase 3 final proposal to the March 2011 Board meeting. As CAISO noted in the stakeholder process such equivalent data is released (i.e., source, sink, TOU, MW, MW Price) in all the eastern ISO/RTO markets.

#### Wind and Solar Forecasting Data

DC Energy notes that CAISO plans to release “an aggregated day ahead forecast at 5:00

AM prior to the day-ahead market” and believes this to be a significant advance however is concerned about the term “aggregated”. DC Energy believes it is important for CAISO to release this data in as granular a fashion as possible (e.g., by hour, by renewable source, and by region).