



Comments of Pacific Gas & Electric Company

Data Release Phase 3 Draft Tariff Language

Submitted by	Company	Date Submitted
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Introduction

Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the stakeholder process for the California Independent System Operator’s (CAISO) Data Release Phase 3 Initiative and to submit comments regarding the September 12, 2012 Draft Tariff Language.

Overall, the Draft Tariff Language provides clarification that is consistent with the CAISO proposal. However, with regards to aggregate generation outage data and the ability to suspend the release of data, the draft language does not adequately address PG&E’s previous concerns.

PG&E provides detailed comments on these two areas in the following section.

Specific Comments on Draft Language

Section 6.5.11 Aggregate Generation Outage Data

- i. *Each day prior to the applicable Integrated Forward Market, the CAISO will publish Generation outage data for each Existing Zone Trading Hub aggregated by fuel category for the current Trading Day and for twenty-nine (29) days following that date.*

PG&E believes the “fuel category” as stated above does not delineate the fuel types per the Data Release Phase 3 Draft Final Proposal nor does it address PG&E’s concerns raised in the March 11, 2011 PG&E comments on the Draft Final Proposal, where PG&E requested to Aggregate Outage data by two fuel categories: Conventional (hydro and thermal) and Renewables¹. PG&E would prefer this aggregation be included explicitly in the tariff language but would understand that CAISO will address PG&E concerns in the implementation phase in a way to protect commercially sensitive information.

¹ http://www.caiso.com/Documents/PG_ECommentsonDataReleasePhase3DraftFinalProposal.pdf

ii. *Authority to Suspend Data Release Items*

PG&E recommends including new tariff provisions that would explicitly grant the CAISO Department of Market Monitoring (DMM) the authority to suspend or delay the release of data if market power mitigation concerns surface. This was the DMM's recommendation in its February 23, 2011 comments². It was PG&E's understanding, after discussion with CAISO staff, that such provision would be included in the tariff. However, it is missing in this draft language.

² <http://www.caiso.com/Documents/DMMCommentsonDataReleasePhase3DraftFinalProposal.pdf>