

# PG&E Comments

## Data Release Phase 3 Draft Final Proposal

Submitted by	Company	Date Submitted
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Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the stakeholder process for the CAISO’s Data Release Phase 3 Initiative and to submit comments regarding the February 17, 2011 Draft Final Proposal.

In general, PG&E is supportive of the Draft Final Proposal. However, we do not support the current proposals regarding the release of transmission limits or the aggregated generation outage data, and we make recommendations for each. Our comments for each data type are provided below.

### **1. Release of Day-Ahead Load Distribution Factors**

#### **Support Current Proposal**

Releasing the Day-Ahead load distribution factors at TD+3 addresses PG&E's concern that this data could be used in a non-competitive manner.

PG&E supports the aggregation of nodes that represent a single customer. We continue to recommend that the CAISO aggregate such nodes on a Sub-LAP basis instead of a single aggregated DLAP number. This may be especially useful if there are numerous single customer nodes. We suggest that the CAISO implement tariff language that allows for flexibility to aggregate at a DLAP or Sub-LAP level depending on the number of such nodes.

### **2. Release of Day-Ahead, HASP, and Real-Time Shift Factors**

#### **Support Current Proposal**

PG&E supports the CAISO's proposal to release all shift factors related to binding constraints at TD+3. As noted by other market participants, this data will be useful to validate the CRR settlement rule calculation and perform related market analysis.

### 3. Release of Transmission Limits

#### **Release of Transmission Data Should be Delayed Until Dynamic Competitive Path Assessment is Implemented**

PG&E supports the release of the transmission limits but only after dynamic competitive path assessment (CPA) is implemented. PG&E remains concerned about releasing transmission outage information given that the CPA studies are done every three months, with these determinations remaining static during each season.

PG&E's concern is explained by the Department of Market Monitoring (DMM) in its comments:

Transmission or generation de-rates or outages can cause the actual system topology and conditions to change from what was used in the seasonal assessment. This could result in situation where a constraint is deemed to be competitive in the CPA study but is in fact uncompetitive under actual system conditions. This in turn could allow a market participant with local market power to go unmitigated through the local market power mitigation process. While the risk of this scenario exists today, PG&E has expressed concern that releasing additional transmission availability and outage information could alert market participants to situations where they can exert market power without mitigation.<sup>1</sup>

The DMM suggests this concern can be mitigated in two ways. First, the DMM will update the seasonal CPA study on an as-needed basis to address an extended outage. Second, the information release policy may be revisited if monitoring indicates release of this information is having anti-competitive or detrimental impacts on market efficiency.

PG&E appreciates these proposed mitigation steps. However, it is unclear how the DMM will implement such monitoring for extended outages, and we are concerned about the additional burden this places on the DMM to monitor for these scenarios and rerun the CPA. A simpler (and less burdensome) solution is to delay the implementation of the release of the transmission data until after a dynamic CPA process is implemented. It is PG&E's understanding that a more dynamic CPA will be implemented in concert with an updated local market power mitigation process which is scheduled for deployment on April 1, 2012. It is not unreasonable to delay the release of the transmission data to that date.

### 4. Aggregated Generation Outage Data

#### **Trading Hubs NP15 and ZP26 Should be Aggregated and Thermal and Hydro Categories Should be Aggregated**

PG&E does not support the Draft Final Proposal because the reporting of generation outage data is too granular. However, we would be supportive of the proposal if it was

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<sup>1</sup> DMM comments Regarding Data Release Phase 3 Draft Final Proposal. February 23, 2011, pp. 1-2, <http://www.aiso.com/2b2f/2b2f7b2857490.pdf>

modified to aggregate the NP15 and ZP26 trading hubs and aggregate the Thermal and Hydro categories.

As noted in the Draft Final Proposal, the CAISO seeks to aggregate data so that resource specific information cannot be ascertained.<sup>2</sup> The proposed level of aggregation does not meet that requirement, and PG&E makes two recommendations to help assure resource specific data is not revealed. First, given the relatively small number of resources in ZP26, we recommend that the ZP26 resources be aggregated with those located in NP15. Second, because of the size of some hydro resources, we recommend the Thermal and Hydro categories be combined into a single Conventional category. These changes would result in the publication of four sets of outage data: two fuel categories for SP15 and two for NP15 and ZP26 combined. At this level of aggregation, individual resource information will be protected.

### **A Disclaimer Regarding Data Quality Should Be Added to the Report**

Generation outage information is subject to change, and CAISO should alert report users of this possibility. PG&E recommends that the CAISO note on the generation outage report that the information is only advisory and subject to change. This disclaimer should be prominently displayed on the electronic report or website where this data is published.

### **Request Clarification on Types of Outages to Be Included in the Report**

PG&E has three clarifying questions as to how the values in this report will be calculated.

1. Will the outages reported simply be the sum of all planned and forced outages in the outage management system as of a particular point in time, or will it be reflective of the CAISO forecast of resource availability? If these two numbers are different, any information regarding the calculations and explanation of discrepancies should be added to the disclaimer we suggest above.
2. Will generation outages that are the result of transmission outages be captured in this report?
3. How will this report reflect MSG outages? The current daily outage report shows mini-outages for each configuration of an MSG resource. However, simply summing these configuration outages will overstate the consolidated resource's total outage.

Clarification on these three questions would be appreciated before this initiative goes to the Board of Governors for approval.

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<sup>2</sup> Data Release Phase 3 Draft Final Proposal. February 17, 2011, p11, <http://www.aiso.com/2b28/2b28d3a24de60.pdf>

## **5. Release of CRR Bid Data**

### **Support Current Proposal**

PG&E appreciates the changes made in the Draft Final Proposal to address our concerns. Specifically, we support the changes to 1) release bid data only from auctions which are conducted after tariff approval from FERC, and 2) release annual auction bid data in quarterly increments after the relevant quarter has passed.

## **6. Release of Wind and Solar Forecasting Data**

### **Support Current Proposal**

PG&E supports the Draft Final Proposal to release aggregated intermittent forecast and production data.

As noted in the proposal the forecast data will include only resources which provide meteorological data and not the total fleet of wind and solar resources. Because the forecast only includes a subset of intermittent resources, PG&E requests that the CAISO provide stakeholders with a list of the resources included in each forecast.<sup>3</sup> This information is necessary for market participants to know what resources are included in the forecasts and thereby give context to the forecasts.

## **7. Other Comments**

### **CAISO Should Maintain Authority to Suspend Any Data Release at Any Time**

The DMM recommended the CAISO explicitly allow for the delay or suspension of the release of the transmission data if the release results in anti-competitive or detrimental impacts on market efficiency.<sup>4</sup> PG&E supports the DMM's recommendation and recommends that the CAISO maintain authority to suspend any data release at any time if it is having a detrimental market impact and make this authority explicit in the tariff for the new Phase 3 releases.

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<sup>3</sup> We envision six lists, one for each trading hub and resource type (wind & solar). The lists should include the names and nameplate capacity of all resources included in the forecast.

<sup>4</sup> DMM comments Regarding Data Release Phase 3 Draft Final Proposal. February 23, 2011, p. 2, <http://www.caiso.com/2b2f/2b2f7b2857490.pdf>