

Comments on Data Release 3 Straw Proposal

Submitted By	Company or Entity	Date Submitted
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Powerex appreciates the opportunity to provide these comments on the CAISO's Data Release 3 Straw Proposal. As a general comment, Powerex believes that transparency and efficient market outcomes are enhanced by the timely release of market information and strongly support this CAISO stakeholder initiative.

On-Going Data Release Process

While Powerex supports the CAISO's approach to handling data release requests from market participants as a useful step in the right direction, Powerex believes the CAISO should take a more pro-active approach to the identification of market data that can be released. The CAISO should not only respond to market participant data release requests but the CAISO should also review the data that resides within the CAISO with the intent to release any data that is not confidential or subject to some legal impediment. Furthermore, Powerex believes the CAISO should review the data that is confidential and/or has legal restrictions to determine if a non-confidential version of the data can be released to the market.

Scope of Data Release 3 Initiative

Day-Ahead Load Distribution Factors

Powerex supports the CAISO's proposal to release on OASIS the actual DA LDFs after the DA market closes.

Day-Ahead and Real-Time Shift Factors

Powerex supports the CAISO's proposal to release the DA shift factors by binding constraint and RT shift factors by binding constraint after each of the markets close. The CAISO has proposed that the DA report and RT report will include the constraint, node and shift factor for each hour and each 5-minute interval, respectively. Powerex requests that the CAISO add an HASP report that includes the same information for each hour, four 15-minute intervals or twelve 5-minute intervals, whichever interval information the CAISO thinks is most appropriate.

Powerex believes the proper platform for the release of this information is OASIS.

Nomogram Definitions and Monitored Constraints

Powerex believes the information the CAISO provides, subject to an NDA, on constraints it plans to enforce and constraints that are actually enforced increase the transparency of the CAISO markets. However, Powerex strongly suggests that the CAISO should publish more detailed information on constraints which are created due to system outages, particularly those outages that reference a SLIC outage. Without additional information, market participants cannot determine if a SLIC outage has material impact.

Transmission Limits

Powerex believes the CAISO's proposal to add the "To Bus" and "From Bus" to the Current Transmission Usage report on OASIS increase the usefulness and ease of use of this information.

Powerex also believes that to the extent the CAISO automatically or manually adjusts transmission limits, through biasing or compensating injections or some other method, the CAISO should publish this information on a timely basis.

Aggregated Generation Outage Data

Powerex believes the CAISO has made a useful proposal with sufficient granularity and historical data. Powerex believes a useful additional improvement would be to add this level of granularity to the Monthly Availability Standards for Resource Adequacy Compliance.

Comparable Timing of Market Data

Powerex believes the current 30 second or less delay is an acceptable compromise but firmly believes that the CAISO should seek to eliminate the time delay in future re-designs of the CAISO's systems, OASIS, CRMI, and ADS.

Powerex also believes that the CAISO should publish more Settlement information, such as the various uplifts, to OASIS to increase transparency..

Release of CRR Bid Data

Powerex believes the CAISO proposal is useful in increasing transparency.

Release of Wind and Solar Forecasting Data

Powerex believes the CAISO proposal is useful in increasing transparency.