

**Stakeholder Comments on:  
CAISO Issue Paper Data Release & Accessibility Phase 3**

| <b>Submitted by</b>     | <b>Company</b>             | <b>Submitted Date</b> |
|-------------------------|----------------------------|-----------------------|
| Wei Zhou (626-302-3273) | Southern California Edison | Dec 28, 2010          |

Southern California Edison "SCE" appreciates the opportunity to participate in the *Data Release & Accessibility* stakeholder process and to submit comments on the CAISO's Issue Paper for Data Release Phase 3, dated December 10, 2010. SCE provides comments on (1) Release of Day-Ahead Full Network Model, (2) Transmission Outage Data Format Improvement, (3) Release of Other Data Elements included in Scope of Data Release Phase 3 and (4) General Data Release Approach

**(1) Information Release Regarding Full Network Model for DAM**

Full Network Model PSS/E raw file (also known as PTI raw file or topology file)

SCE feels it appropriate for the CAISO to address stakeholder requests for the release of the day-ahead full network model, along with other information release, as part of the Phase 3 of Data Release Initiative. In particular, SCE requests the CAISO augment its issue paper to include the release of the actual hourly day-ahead full network model in the PSS/E raw file format.

Currently, the CAISO only releases the CRR Full Network Model (FNM). As described in the issue paper, there is approximately a six (6) weeks lag between the CRR FNM release and the actual network model utilized for the day ahead and real time markets. Further, the CRR FNM released today only includes two snapshots, in PSS/E raw file format, to represent the on-peak and off-peak conditions of the system for the entire CRR market period, i.e., on-peak and off-peak snapshots for the entire month for monthly auction/allocation and on-peak and off-peak snapshots for the entire season for seasonal auction/allocation. In comparison, the day-ahead markets utilize hourly system snapshots, in the PSS/E raw file format, to clear the markets. As such, the actual day-ahead full network model can be different for each day and each hour. In addition, the CRR network model is a simplified DC model whereas the day-ahead model is an AC model. Due to these reasons, the CRR network model is very limited for market participants to simulate the day-ahead markets. To enhance market efficiency, SCE requests the CAISO to release the actual hourly PSS/E raw files used in the day-ahead markets.

During the Data Release Phase 1 stakeholder process, the CAISO stated that “It is not possible to release daily PSSE raw files because that would provide clear insight into market participant bid information”<sup>1</sup>. In the SCE’s view, the PSS/E raw files provide a description of grid network topology separate from bids prepared *before* the market runs, and it’s not obvious that those files contain any confidential bid information. Given that the CAISO publishes generation outages and transmission outages on a daily basis on its website<sup>2</sup> and that the CAISO publishes the base PSS/E raw file for CRR data release, SCE believes there should not be any concern over releasing the hourly PSS/E raw files. We request that the Department of Market Monitoring (DMM) also give an opinion on this issue.

If concerns that releasing the PSS/E raw files will expose bidding data are valid then SCE encourages the ISO to propose a release schedule that meets the needs of the market as a whole.

## **(2) Transmission Outage Data Format Improvement**

In general, SCE supports enhancing the transmission outage reports<sup>2</sup> to include additional information that is available to the CAISO, if it is determined that there is no confidentiality issue and with the stipulation that no additional reporting obligations are imposed on the Transmission Owners in order to make this information available.

To be specific, SCE supports the CAISO enhancing the transmission outage reports to include additional information such as bus IDs for market participants to map the transmission outages in the full network model.

## **(3) Other Data Elements included in Scope of Data Release Phase 3**

As stated previously, SCE requests that the release of the hourly PSS/E raw files that are used to clear the day-ahead markets to be included for the scope of Data Release Phase 3.

---

<sup>1</sup>See CAISO Straw Proposal, Page 6. Link: <http://www.aiso.com/247a/247a5b7c6acd0.pdf>

<sup>2</sup> Link to daily generation and transmission outage report: <https://www.aiso.com/transout/> Certificate Required. The outage information is published there without information on the associated bus numbers that are defined in the Full Network Model. Therefore, the outage information can’t be accurately modeled by market participants for market analysis and results validation.

SCE would like to take this opportunity to comment on other data elements that are listed in the issue paper under the scope of this phase.

### **Load Distribution Factors (LDFs)**

SCE requests that the CAISO to release the actual hourly LDFs that clear the day-ahead markets on a daily basis. As described in the issue paper, release of the LDFs will allow market participants to more accurately analyze and simulate ISO markets, help identify LDF-related modeling issues, and better understand the outcomes of virtual bids.

### **Shift Factors**

SCE requests the ISO to release the shift factors for the day-ahead markets and the real-time markets (1) to allow market participants to better analyze market outcomes and (2) to validate the CRR clawback settlement rule under convergence bidding.

To be able to fully validate the CRR clawback settlement rule under convergence bidding, SCE requests the CAISO to release the information on flow impacts to binding transmission constraints by virtual bids, in addition to the hourly day-ahead and 5-minute real-time shift factors, to all market participants whenever a clawback occurs in the markets.

### **Nomogram Definitions and Constraint Monitoring**

SCE supports the release of limits of new/critical constraints such as SCE's 60/40 and SDGE's 75/25 constraints for the day-ahead markets. SCE supports the release of adjusted transmission limits in the day-ahead markets. Furthermore, SCE supports the CAISO to evaluate improvements to the existing release of nomogram definitions and monitored constraints prior to running of the day-ahead and real-time markets.

SCE strongly opposes the CAISO releasing a complete list of CAISO operating procedures (operations and planning) since such a release will expose weakness of the grid and impact the mitigation plans for system reliability and safety.

### **Transmission Modeling and Outages**

As stated above, SCE supports the CAISO to release the actual transmission limits modeled in the day-ahead markets. For transmission outage report data, please see Section 2 above.

**Generation Outage Data and Masking of individual resources**

SCE agrees with the CAISO that any generation specific information should not be released. Aggregation data regarding generation outage can be released only to the extent that one can not relate the released outage information to specific resources.

**Release of CRR Bid Data and VER Forecasting Data**

SCE supports the CAISO re-evaluating its position on the release of CRR bids with the entity being masked in the data.

SCE supports the CAISO to release VER Forecasting Data to allow market participants to analyze price convergence between day-ahead and real-time markets due to VER forecasting error. As emphasized in the issue paper, individual market participant data should be masked in the VER Forecasting Data.

**(4) General Data Release Approach**

SCE supports the day-ahead full network model data to be released through the existing NDA process for the release of CRR FNM.