

**Stakeholder Comments on:  
CAISO Draft Final Proposal - Data Release & Accessibility Phase 1**

<b>Submitted by</b>	<b>Company</b>	<b>Submitted Date</b>
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Southern California Edison "SCE" appreciates the opportunity to participate in the *Data Release & Accessibility* stakeholder process and to submit comments on the Draft Final Proposal for Data Release & Accessibility Phase 1: Transmission Constraints, dated January 6, 2010. SCE provides comments on (1) Data release elements addressed in the Phase 1 Draft Final Proposal, and (2) Related data release elements not addressed in the Phase 1 Draft Final Proposal.

**(1) Data release elements addressed in the Phase 1 Draft Final Proposal**

SCE supports the CAISO proposal to provide Post-Market and Pre-Market Constraints and Contingencies List on a daily basis. SCE supports the CAISO proposal to provide additional information regarding the cause of a binding constraint in addition to the shadow price information. SCE supports the CAISO proposal to provide a periodic Conforming Constraint Report for IFM, RUC and RTM. SCE supports the CAISO proposal to issue advance notices prior to making significant changes to transmission constraints.

SCE supports the CAISO proposal to improve network terminology/nomenclature and to explore the possibility of creating additional data mapping that would correlate the transmission facilities in outage reports with other ISO data.

It's SCE's understanding that the CAISO proposes to release the same information for RUC as well; and SCE strongly supports that the CAISO to release Post-Market and Pre-Market Constraints and Contingencies List, and the cause of a binding constraint in addition to the shadow price information for RUC, in a same manner for IFM.

**(2) Related data release elements not addressed in the Phase 1 Draft Final Proposal**

SCE understands that more data release elements will be addressed in next phases of this initiative. SCE would also like to take this opportunity to reiterate its position and requests the CAISO to release critical data elements to the market that are not addressed in Phase 1. Those data elements include:

- PSSE raw files (topology files) that are used to clear day-ahead markets,
- Actual LDF's used to solve the day-ahead and real-time markets,
- Intertie flow data, and
- Limits of critical transmission constraints and nomograms such as SCE\_PCT\_IMP\_BG, G-217 and G-219 nomograms. If the limits of those transmission constraints and nomograms change during the day, the limits for each hour should be released.

As a point of clarification, it's SCE's understanding that the same data release policies proposed in Phase 1 Draft Final Proposal will be applied to both IFM and RUC (together as Day-Ahead Market), and the language in the current CRR FNM NDA is proposed to be modified to include use of FNM data for review and analysis of RUC (as well as IFM, HASP and RTM).