

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Commission Information Collection
Activities (FERC—922); Comment Request

Docket No. AD19-16-000

**COMMENTS OF CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION**

The California Independent System Operator Corporation (CAISO) respectfully submits these comments in response to the Federal Energy Regulatory Commission’s notice of information collection and request for comments regarding Commission staff’s information collection for performance metrics for independent system operators (ISOs), regional transmission operators (RTOs), and regions outside ISOs and RTOs.¹

The CAISO supports measures to provide information about its markets and operations to market participants and other stakeholders. Indeed, the CAISO already provides significant transparency about its markets and operations through multiple mechanisms; including through, among others, public stakeholder processes, reports, and its market performance and planning forum. The CAISO also supports the Commission’s effort to collect information relating to the proposed performance metrics.

Based on its review of the Commission’s notice and supporting materials, there are some metrics for which the CAISO either does not have responsive information or

¹ *Commission Information Collection Activities (FERC—922); Comment Request*, Notice of information collection and request for comments, 84 Fed. Reg. 32908 (July 10, 2019), Docket No. AD19-16-000 (2019).

calculates data responsive to the metric in a manner that deviates from the proposed metric. For example, the CAISO does not operate a centralized capacity market and cannot provide information in response to the proposed Group 3 metrics. The Commission's notice acknowledges this fact.

In other instances, the CAISO collects information in a manner that may not be consistent with the proposed metrics. As a result, the information the CAISO provides for the reporting years 2014-2018 may deviate from the proposed metrics. For instance, the CAISO does not calculate Equivalent Forced Outage Rate demand information identified by Metric # 7, and did not do so for the proposed reporting period 2014-2018. In prior common metric reports, the CAISO reported average annual generator availability based on the total generation MW unavailable due to forced outages for the year compared to the maximum generation capacity within the CAISO. The CAISO is exploring how to report similar information by the resource types identified in Metric #7.

Another example involves Metric #15, price convergence between the day ahead and real-time market. Although the metric recommends comparing day-ahead and real-time market energy prices, the CAISO's real-time market includes both a fifteen minute market and a 5 minute real-time dispatch. The CAISO is assessing how best to provide the Commission with meaningful information in response to this metric.

As the CAISO continues to review the performance metrics proposed by the Commission it may identify other variances between the metrics requested and the data the CAISO is able to provide. As part of any data submission in response to the

performance metrics, the CAISO will identify these variances and explain how any information it provides responds to the metric identified.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 9th day of September 2019.

/s/ Anna Pascuzzo
Anna Pascuzzo