

**Stakeholder Comments on:
CAISO Issue Paper Data Release & Accessibility Phase 1**

Submitted by	Company	Submitted Date
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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 CAISO's Issue Paper for Data Release & Accessibility Phase 1: Transmission Constraints, dated November 5, 2009. SCE provides comments on (1) Information Release Regarding Full Network Model and Transmission Constraints for DAM, (2) Other Types of Information Release for DAM, (3) Information Release for RUC and RTM, and (4) General Data Release Approach.

(1) Information Release Regarding Full Network Model and Transmission Constraints for DAM

SCE requests the ISO to release all input data that is used to clear everyday's Day-Ahead market. Regarding the data format, SCE feels it's appropriate to release a data package on a daily basis similar to the CRR FNM package that the ISO currently releases. SCE further provides comments on individual data components to be included in such data package:

Full Network Model PSSE/PTI raw file (also known as topology file)

SCE requests the ISO to release the actual 24 hourly PSSE raw files that clears the DAM market on a daily basis. It's SCE's understanding that daily/hourly outage information is embedded in those raw files. Therefore, with those files available to market participants, market participants do not need to take extra effort to model daily outages currently published on CAISO's website. The outage data currently posted on OASIS lacks sufficient information to accurately model outages for market participants. Releasing the PSSE raw files will save significant amount of time and effort for market participants to perform market analysis.

If, however, the ISO has concerns that the actual PSSE raw files contain commercial sensitive information and inappropriate to release shortly after the market day, SCE respectfully requests the ISO to clarify its concerns in the Straw proposal. A potential solution to alleviate concerns regarding commercially sensitive information would be for the CAISO to release the actual PSSE raw files for time frame 1 -2 weeks after the market closes.

Daily All Constraints List

CAISO should provide market participants with a Daily All Constraints List which should include a list of all enforced and unenforced constraints for a given Day-Ahead market solution. The ISO should provide information regarding definition, limitation (both normal and emergency limits), and enforcement status for all branches, transformers, flowgates, transmission corridors (ITC, MSL, etc.) and nomograms that are modeled for a given Day-Ahead market solution. If the limits of certain transmission constraints are not constant during the day, the hourly limits should also be provided. Some nomograms may not be modeled in CRR market but are modeled in DAM should also be included on this list. If some transmission constraints are only enforced under some contingency cases, then the information about such transmission constraints and the associated contingencies should also be provided in the list.

Daily All Contingencies List

CAISO should provide market participants with a Daily All Contingencies List which should include all contingencies and a flag for each contingency to indicate whether it's active or inactive for a given Day-Ahead market solution. Both the name and the definition of those contingencies should be provided.

The definition of constraints and contingencies on Daily All Constraints List and Daily All Contingencies List should allow market participants to map those constraints and contingencies to the corresponding transmission facilities that are defined in the PSSE raw files. The definitions should be in the format as the interface definitions in the current CRR FNM package. In general if preferable for implementation, the definitions can be released the same time as the new DB version is available. But when new nomograms or branch groups are created on the fly due to outages or other system conditions, their definitions should be posted at the same time as the daily constraint and contingency list.

(2) Other Types of Information Release for DAM

SCE would like to take this opportunity to comment on data release for other types of modeling information in the DAM.

Load Distribution Factor (LDF)

SCE requests the ISO release the actual hourly LDFs that clear the DAM market on a daily basis, to increase the transparency in the ISO market operation. The set of LDFs released in CRR FNM

package representing typical seasons does not satisfy the need to analyzing the daily DAM market.

Transmission Limit Adjustment

SCE requests the ISO to release the actual limits that clear the DAM market on a daily basis. If the limit of any transmission facilities is adjusted, the ISO should provide the adjusted limit to market participants.

It is SCE's position that the ISO also provide justifications for its limit adjustment activities. As such, SCE requests the ISO explain the policy behind the activities of adjusting transmission limits for reliability margin to account for the uncertainty of intermittent resources (refer to presentation <http://www.caiso.com/2462/246211a991eb50.pdf> slide 19). For those intermittent resources electing Full Capacity deliverability status how is this policy of reserving a reliability margin, increasing the probability of day-ahead market congestion, lowering the generator LMP consistent with their election for deliverability? Does the policy use the Capacity Benefit Margin in this case? Please provide an example applying this policy to a PIRP resource in both the day-ahead and real-time market.

Planned Transmission Outages

SCE supports, for general CRR analysis, that the ISO should release additional information on transmission outages. This additional data should be based on what the CAISO already has in their possession, and should not create any new obligations (reporting or outage scheduling) on Transmission Owners. We realize the CAISO views much of this data as "preliminary" or "subject to change". The CAISO should simply communicate such, and in no way "warrantee" the information. Understanding the limitations, market participants can use the data accordingly.

For example, releasing transmission outages when known in advance of the scheduled actual outage date may benefit both the monthly and annual CRR allocation/auction. There is a general consensus that it's appropriate to release transmission outages information when such information is available and that TOs are not required to submit transmission outages beyond the current required time window.

To help the discussion, PJM post all approved and known planned transmission outages for the future period beyond one year in advance. For example, at: http://oasis.pjm.com/doc/linesout_new.txt , one can see that outages are posted beginning in April 2011.

Information on Binding Constraint and Causes

SCE supports the ISO’s proposal to provide to market participants the information on the cause and the associated contingency when applicable for binding constraints as other ISOs currently release. We propose the format in Figure 1 for shadow prices of binding constraints. The format of the monitored description and contingency description can be the same as the current format for binding constraints. for example: 33252_POTRERO3_20.0_33204_POTRERO _115_XF_G3

Constraint ID	Constraint Name	Monitored Description	Contingency ID	Contingency Description	HE1	HE2	HE3	...	HE24
999	Line 1 L/O Xfmr 4	Line 1	888	Xmfr 4			21		
1234	IPPDCADLN_BG	IPPDCADLN_BG		Base Case		5			

(3) Information Release for RUC and RTM

While the Issue Paper doesn’t explicitly address the data release policy for RUC and it’s not clear from the Issue Paper whether RUC’s included in the scope, SCE requests the ISO clarify the data release policy on RUC. SCE requests the ISO to release to market participants Daily All Constraints and Contingencies List, transmission limits including limit adjustments, and other market data including the PSSE raw files and LDFs, in a similar data package, for RUC.

SCE requests the ISO to consider releasing a similar data package for RTM on an interval basis. While CAISO stated that it is not possible to provide such information for the RT market due to time granularity, SCE proposes the ISO create such a list, but have it published less frequently than the RT market. For example, such list can be created and posted for all the 5-min intervals of trading day T on T+1. At minimum, the ISO should release the actual PSSE raw files for DAM with daily/hourly outage information embedded to allow market participants to be able to identify changes on system conditions to better analyze and understand market outcomes.

(4) General Data Release Approach

SCE supports the first data release approach, that is Creation of a Daily Data Package including Daily All Constraints and Contingencies List and other information identified in the paper and the stakeholders process. SCE requests to release actual data package a short time period (1 -2 weeks) after the market closes (through some secured websites if needed). SCE requests the ISO to provide more transparency and publish information on potential changes to the market input in advance whenever the changes would potentially have significant impacts to the market.