

**Stakeholder Comments on:
CAISO Proposal and Draft Tariff Language - Data Release & Accessibility Phase 1**

Submitted by	Company	Submitted Date
Wei Zhou (626-302-3273)	Southern California Edison	December 16, 2009

Southern California Edison "SCE" appreciates the opportunity to participate in the *Data Release & Accessibility* stakeholder process and to submit comments on the Straw Proposal and Draft Tariff Language for Data Release & Accessibility Phase 1: Transmission Constraints, dated December 3, 2009. SCE provides comments on (1) Information Release addressed in the Straw Proposal, and (2) Constraint Management Practice addressed in the Draft Tariff Language.

(1) Information Release addressed in the CAISO's Straw Proposal

SCE supports the CAISO proposal to provide All Constraints List and All Contingency List on a daily basis after the market is complete. SCE supports the CAISO proposal to provide advance notices prior to adding new constraints, changing enforcement status on significant transmission constraints, or excluding constraints from the market runs. SCE supports the CAISO proposal to perform a security check in a means similar to the Non-Disclosure Agreement in the current CRR information release policy.

SCE would also like to take this opportunity to reiterate its position on 1) PSSE file release and 2) transmission limit adjustment information release.

Regarding PSSE raw files, 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"¹. In the SCE's view, the PSSE 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 website² and that the CAISO publishes the base PSSE raw file for CRR data release, SCE believes there should not be any concern over releasing the daily PSSE raw files. We request that the Department of Market Monitoring (DMM) also give an opinion on this issue.

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

² 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.

As explained in the SCE's comments on the Issue Paper³, with little effort from the CAISO to publish this information, it will save significant amount of time and effort for market participants to perform market analysis with outages information included. Therefore, SCE requests the CAISO to release the AC power flow model and the 24 hourly PSSE raw files that clear the Day-Ahead market on a daily basis. A potential solution to alleviate concerns regarding confidential bid information would be for the CAISO to release the PSSE raw files for time frame 1 – 2 weeks after the market closes.

Regarding transmission limit adjustments, SCE requests the CAISO to provide the adjusted transmission limits along with the daily All Constraints and Contingencies List. Since market results are very sensitive to transmission limits, especially any limits after adjustment, providing this information is critical to providing more transparency to the market and increasing participants' confidence in the market.

(2) Constraint Management Practice addressed in the CAISO's Draft Tariff Language

SCE requests the CAISO to provide more transparency regarding its constraint management practice. SCE suggests the CAISO to develop standard processes and procedures that the CAISO should follow in situations that it needs to change the enforcement status and adjust the transmission limit from their normal conditions. SCE requests the CAISO to release the actual enforcement status and the actual limits that clear the market, as well as justifications on the enforcement status change and limit adjustment if there is any, on a daily basis.

³ Link: <http://www.caiso.com/2470/2470c9f028db0.pdf>, Page 1.