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WPTF appreciates the opportunity to submit these comments and we appreciate the CAISO's efforts in the stakeholder process.

WPTF offers comments consistent with those submitted previously and expressed during the stakeholder process. WPTF appreciates the detailed information the CAISO has proposed to post, and we have comments in three areas.

Constraint Limits Should be Posted

While it is helpful for a market participant to know whether a constraint is being monitored or not, that information not particularly meaningful if the CAISO does not post the limits of the constraint. For example, a constraint could have a physical limit of 100 MW. The CAISO's indicating that the constraint will be enforced provides significantly more information than is available today. But, for example, the CAISO could enforce the constraint at 1 MW or 200 MW, and the impact to the market would be significantly different. Without information about the limit the information about enforcement is significantly compromised.

WPTF's understanding is that the DMM does not feel it necessary to control the information about the limits. If there are other reasons why the information about certain limits needs to be controlled the CAISO should explicitly indicate the reasons, make the security case for why, and put in place procedures to ensure only those individuals who have passed appropriate screening receive the information. Otherwise the CAISO should post the actual limits. Preferably the CAISO would post the physical limits and any operational adjustments made to the limits for other reasons (e.g., biasing).

Reasons for Network Changes Should be Included

One primary reason for posting information about the enforcement of constraints is such that market participants can begin to better understand the operation and configuration of the CAISO. Posting the constraints offers the ability for SCs to diagnose after the fact what happened. But also providing reasons provides SCs much more of an opportunity to predict or understand possible future operational configurations. This is desirable as it allows market participants to make prudent business decisions and manage risks, affording the CAISO market place liquid markets and lower costs. We ask that the CAISO's tables be modified to indicate reason codes when the system configuration varies for that of the standard FNM.

Shadow Price Information Should be Posted

WPTF strongly encourages the CAISO to post the shadow prices of the constraints enforced. It is unclear whether the CAISO plans to do so. Like the limits, the shadow prices are critical to understanding the operation of the markets.