

# Stakeholder Comments Template

## CASIO Draft Final Proposal: Convergence Bidding Data Release

Submitted By (Name & phone number)	Company or Entity	Date Submitted
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Southern California Edison Company ("SCE") would like to thank the California Independent System Operator Corp. ("CAISO") for providing the opportunity to submit comments on the "Draft Final Proposal for Convergence Bidding Data Release, dated January 15, 2010. SCE appreciates the hard work performed by CASO staff in soliciting stakeholder feedback and developing a balanced final proposal in a timely and efficient manner.

### **SCE Supports the Proposal to Release the Net Cleared Virtual Quantity by Node**

SCE supports the Draft Final Proposal (the Proposal) to release the net cleared quantity of virtual bids by node, by hour. SCE agrees with the MSC that releasing the net cleared quantity of virtual bids will provide necessary transparency into the virtual bidding market as well as improve overall market efficiency. Moreover, we agree with the MSC that virtual bids are foundationally different than physical bids and absent information release the market in general will have no transparency or indication on how virtual bids influence market results. In addition, the release of such information will improve the ability of all market participants to gauge the success of convergence bidding on an individual and system wide basis.

SCE agrees with the CAISO's assessment that the release of net cleared virtual quantity by node would not expose a suppliers hedging strategies or release commercially sensitive information that would harm virtual participation. Under the CAISO proposal the market would be unable to determine bidder identity, the contents of virtual bids submitted, or the number of bids submitted at a given node. As pointed out by the MSC, releasing the net cleared quantity, releases a single number per node to the market and this single value can result from an infinite number of combinations of individual virtual supply and demand bids. Moreover, we agree with the MSC that since the proposal releases aggregate data after the real-time market concludes, and since the CAISO market design allows all participants to submit bids anywhere on the grid, the Proposal does not reveal commercially sensitive information.