

Western Power Trading Forum (WPTF) comments on CAISO 1/20/10 Straw Proposal for Convergence Bidding Data
Release
January 27, 2010

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WPTF appreciates the opportunity to submit these comments.

WPTF is generally very supportive of transparency. We strongly support the release of aggregate virtual cleared quantities at the LAPs, HUBs and interties - where certainly cleared physical quantities could and should be also released - at the close of the market.

Consistent with past comments, WPTF continues to believe that the potential harm of releasing nodal virtual cleared quantities, without releasing accompanying physical cleared and actual quantities, outweighs the benefits.

WPTF also finds it discriminatory against the sector of participants that may wish to virtual bid that the CAISO is considering releasing such information – information that many participants feel has commercial significance – while the CAISO has not proposed to release actual LDFs. There has been no substantial basis provided by the ISO for the reason for not posting LDFs and the great majority of market participants wish such LDFs to be provided. While PG&E expressed the concern that releasing LDFs may release customer-specific information, other participants have no more information about the number of customers at each node than they have about the number of virtual bidders at each node. Because of this the CAISO's proposal to release virtual information without increased transparency to cleared actual loads would clearly disadvantage virtual participants over physical participants.

Please refer to our previous comments for further details regarding the adverse impacts of releasing nodal cleared quantities.

Lastly, we understand that the CAISO is considering not capturing its data release policies in tariff language to be filed with FERC. WPTF would certainly appreciate the CAISO's mention of the resolution of its data release stakeholder process in its transmittal letter to FERC with the other Convergence Bidding provisions.