

Comments Submitted to the California ISO Regarding the Transmission Constraints Draft Tariff Language Posted on March 12, 2010

Num	Name of Party	Comment	ISO response
1	Dynergy	<p>the proposed tariff language provides few details about what information the CAISO will provide in the Transmission Constraints Enforcement List.</p> <p>To honor the commitments the CAISO made in that process, the CAISO should list in its tariff the transmission constraint information it has committed to provide.</p> <p>It appears the CAISO has created a new defined term – “Transmission Constraints Enforcement List”. It would be appropriate to list the information that will be provided in that list in the tariff Appendix A definition of that term.</p>	<p>The ISO will include the following definition in the proposed tariff sheets to address the need for further definition of the Transmission Constraints Enforcement Lists:</p> <p>Consist of the post-Day-Ahead Market transmission Constraints list and the pre-Day-Ahead Market transmission Constraints list made available by the CAISO pursuant to Section 6.5.3.3. The post-Day-Ahead Market transmission Constraints list consists of the transmission Constraints enforced or not enforced in the Day-Ahead Market conducted on any given day. The pre-Day-Ahead Market transmission Constraints the CAISO plans to enforce or not enforce in the next day’s Day-Ahead Market. These lists will identify and include definitions for all Constraints, including contingencies and nomograms. The definition of the Constraint includes the individual elements that constitute the transmission Constraint. Both lists will each contain the same data elements and will provide: the flowgate Constraints; transmission corridor Constraints; the Nomogram Constraints; and the list of transmission Contingencies.</p>
2	PG&E	<p>Tariff Section 6.5.3.3</p> <p>The first sentence in this section states that the "enforced" data tables will be published after the market results are posted. However, the Draft</p>	<p>The ISO intends to provide this information as soon as possible after the ISO has posted the Day-Ahead Market results. It is not possible to make this information available simultaneously</p>

		<p>Final Proposal states they will be published simultaneous with the market results.</p> <p>A similar timing inconsistency appears in the second sentence. Here, the language simply states that the "planned enforced" tables will be published prior to the next day-ahead market, but makes no specific reference to time or events. The Draft Final Proposal stated</p> <p>that this data would be published by 1800 hours the day previous to the close of the market. We suggest a tariff reference to 1800 hours be added, similar to the Proposal.</p>	<p>with the Day-Ahead Market results. In addition, it is the ISO's intent to provide this information before 18:00, however, the ISO does not believe it appropriate to constrain the timing when it provides the information. Given the commitment to make this information made available daily in the tariff, it is not clear what additional term of condition is required in the tariff.</p>
3	PG&E	<p>We believe the CAISO's commitment to release a monthly Conforming Report should be represented in the proposed tariff language. The specifics of the report can be detailed in the BPMs, but PG&E suggests the CAISO include tariff language regarding CAISO's obligation to produce the report.</p>	<p>The ISO will include this requirement in the proposed tariff language. However, because the information is not confidential information nor is it sensitive due to security reasons, it is not evident why the ISO should be required to place this detail in the tariff. The ISO is committed to and has already begun providing such information and does not believe it is necessary to wait for tariff authority to do so.</p>
4	PG&E	<p>It is unclear to us how the CAISO intends to memorialize its commitment to give 10-days advance notice to market participants whenever a new transmission constraint is added to the Full Network Model (FNM). It may be sufficient for this provision to only appear in the BPM, but PG&E asks the CAISO to clarify how this commitment will be documented</p>	<p>The ISO did not bring this requirement to the Board of Governors for approval because this is not a policy matter that the Board must approve. The ISO has already implemented the provision of these notifications and does not believe it is the level of detail that should be contained in the tariff. However, the ISO agrees to that to the extent the BPM does not already include all the notifications agreed, the ISO will consider including additional descriptions as necessary of such notifications in the BPM for FNM.</p>
5	PG&E	<p>We seek confirmation that the CAISO intends to</p>	<p>The ISO already provides the definition of the</p>

		publish nomogram limits in the CRR FNM. It was our understanding from the stakeholder process that the CAISO would consider publishing the nomograms limits, similar to the transmission line limits. PG&E asks the CAISO for confirmation and to specify how this commitment should best be documented.	nomograms limits that the CRR team enforces in the CRR processes.
6	WPTF	More detail is needed in the tariff language describing the transmission constraint information that the CAISO will provide. The CAISO's stakeholder process proposal includes specific tables that detail the data the CAISO will provide. The tariff language should describe the types of constraint information the CAISO will provide.	See response to item 1.
7	WPTF	The CAISO has provided a new defined term in Section 6.5.3.3.1 – Transmission Constraints Enforcement List – but does not seem to provide the definition. This definition may be an appropriate place to provide the type of information that corresponds to the Enforcement, as we request in item 1, above.	See response to item 1.
8	WPTF	While the CAISO has proposed to modify section 6.5.3.2.2 for information provided at the close of the DA market, no corresponding tariff revision has been offered for the transmission constraint information that was to be provided prior to the conduct of the market. That revision is still needed.	See response to item 1. This information was in language previously posted. However, the response to item 1 and the revised tariff language should address this question.
9	WPTF	The timing for release of the CRR model and FNM should be added to the FNM and CRR parts of the tariff language.	This request is outside the scope of the current proceeding and there is already material available in the BPMs that describes the release of the CRR FNM adequately.

10	WPTF	<p>In draft section 6.5.3.3.1 the CAISO has proposed the clause: “that satisfy the following requirements and any related procedures set forth in the Business Practice Manual”. All necessary tariff-level requirements should be specified in the tariff and the BPM requirements should only be implementing details for the tariff requirements. The CAISO should thereby strike the phrase “and any related procedures set forth in the Business Practice Manual” and instead include any additional requirements that are necessary within the tariff language itself.</p>	<p>The ISO agrees to remove the statement “and any related procedures set forth in the Business Practice Manual.” All the terms of service with respect to the provision of this information are in the proposed tariff language. However, it must be noted that consistent with industry practice, the ISO may provide additional detail regarding business practices in its Business Practice Manuals that implement these terms of service.</p>