

# PG&E Comments

## Data Release & Accessibility - Phase 1

Submitted by	Company	Date Submitted
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Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the stakeholder process for Phase 1 of the CAISO’s Data Release initiative and to submit comments regarding the December 3, 2009 Straw Proposal and the December 10, 2009 CAISO Presentation.

PG&E supports the CAISO’s effort to provide greater transparency into the transmission constraints enforcement process. We believe that the straw proposal addresses the release of some of the transmission information necessary for market participants to better understand market outcomes and perform price validations. We have provided specific comments regarding the information the CAISO plans to release. We also comment on the proposed tariff language regarding transmission constraint management.

**Constraint Enforcement Practices**

**1. Support Market Notice for New Full Network Model:** PG&E supports the CAISO's proposal to issue a Market Notice ten (10) days before implementation of a new FNM Database in the market software.

**Constraint & Contingency Lists**

**2. Support Release of Daily All Constraints List:** For the reasons outlined by the CAISO, PG&E supports the daily release of all constraints. The daily release would apply to three of the four proposed data tables except Table 2 (Transmission Corridor Constraints) which would be made available with each model build.

**3. Support Data Release at the Close of the Day-Ahead Market:** PG&E supports the CAISO's proposal to publish three of the four tables daily at the close of the Day-Ahead market. We believe this timing reduces the possibility a participant could use this data to manipulate the Day-Ahead market in which 90-95% of the energy is scheduled. We acknowledge that the Local Market Power Mitigation process should mitigate the exercise of local market power, but all such mitigation processes are imperfect and serve as one of a number defenses against market manipulation. Another defense is the appropriate timing of the released data to reduce the possibility that this data could be used to manipulate the market.

Additionally, providing the data before the IFM would result in a data set that does reflect the constraints enforced in the actual IFM run. At the December 10<sup>th</sup> Stakeholder Meeting, it was estimated that a pre-IFM prepared data set may be up to 5% different than a data set reflecting the actual IFM constraints. The introduction of this level of error could affect the usefulness of this data to understand market outcomes and perform price validations

**4. Request Indication of Enforcement Status for Both IFM and RUC (All Tables):**

At the December 10<sup>th</sup> stakeholder meeting, the CAISO acknowledged that it would be willing to release data for both the IFM and RUC. To facilitate the display of this information, we suggest that the “Enforce” and “Competitive” columns for Tables 1, 3 and 4 display more detail. Rather than a simple yes/no approach, we suggest that possible values include: IFM/RUC/Both/Neither. This would eliminate the need for an extra table while still allowing market participants to see which constraints were enforced for each market.

**5. Request Additional Nomogram Data (Table 3):** The proposed nomogram data in Table 3 is incomplete. For the nomogram data to be useful the CAISO should also release the nomogram flow limit or the “right side of equation”. Without this information, the nomogram data is of little use.

**6. Request Constraint List Include the New Generation Nomograms/Constraints:** It is unclear whether the nomogram or constraint lists will include the generation constraints that the CAISO recently started to enforce in the network model. If they do not, PG&E recommends these be included.

**Binding Constraint and Cause**

**7. Support SCE's Request for Contingencies Information:** PG&E supports SCE's request that the CAISO list both the contingency and monitored facility for contingency-related binding constraints.

**Proposed Tariff Modifications**

**8. Support Proposed Tariff Changes:** PG&E acknowledges that the proposed language provides high-level guidelines for the determination of constraint enforcement. It is our understanding the proposed tariff change will be submitted to FERC as part of the December 31, 2009 compliance filing, and another tariff filing will be made after the compliance filing which will outline the transmission constraint information to be released by the CAISO. Therefore, market participants will have an opportunity to comment on that tariff language outlining the transmission data release at a later date. If this understanding is incorrect, PG&E requests a clarification.

We noted a grammatical error in 27.5.1.1 (line 27). It seems that the word "the" should be inserted after "delivered to".