

# PG&E Comments

## Data Release Phase 3 Issue Paper

Submitted by	Company	Date Submitted
Ian Quirk (415) 973-9798	PG&E	December 28, 2010

Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the stakeholder process for the CAISO’s Data Release Phase 3 Initiative and to submit comments regarding the December 10, 2010 Issue Paper.

**1. Additional Market Model Data**

○ **Additional Market Data Should Be Published Outside of the CRR Model**

It is unclear if the CAISO intends to add additional modeling data to the CRR model, or if this will be placed somewhere else. It is PG&E’s strong preference the CRR model is not complicated further and any additional data is published on OASIS or some other interface.

○ **Do Not Oppose Releasing Day-Ahead LDFs, Provided that:**

- 1. LDFs are aggregated as to not reveal specific customer data, and**
- 2. LDFs are only released after the close of all markets.**

Many market participants have asked for the release of day-ahead LDFs. PG&E understands their value for validation and market simulation, but PG&E also has two concerns with releasing this data. First, some nodes represent a single customer. For these nodes, releasing an LDF would be inappropriate because it would reveal customer-specific usage information. Our recommendation is that any node representing a single customer should be aggregated and published along with several surrounding nodes to protect the confidentiality of customer data.

Our second concern is that this data could be used by market participants to take advantage of errors in the CAISO’s calculation of the LDFs. For this reason, PG&E strongly recommends that the CAISO withhold publishing the LDFs until after the close of all markets. This will still provide significant value in terms of validating market results but will eliminate the ability to exploit possible CAISO modeling errors in the real-time market.

○ **Support Release of Monthly Average Shift Factors, but Not Daily or Hourly**

The current CRR FNM already contains enough information for market participants to calculate monthly average shift factors. Therefore, releasing monthly shift factors

would only be an added convenience and would not release any more sensitive information than is already publicly available through the CRR FNM.

However, releasing more granular shift factors (daily or hourly) would go significantly beyond what is currently available. PG&E is specifically concerned that releasing this granularity of shift factors could reveal proprietary transmission information such as short-term switching decisions. Information about short-term changes to the transmission system could be exploited because the competitive path assessment (CPA) used as the basis of local market power mitigation (LMPM) is done only seasonally. Short-term transmission changes could make competitive paths noncompetitive. However, these short-term changes are not recognized by the CPA or LMPM processes.

- **Support Reporting Nomogram Data Available Publicly Through WECC, but Not Short-term or Localized Nomograms**

Some nomograms are posted publically for WECC members. PG&E has no issue reporting out nomogram information that is public to WECC members. However, PG&E does not support the reporting of short-term or localized nomograms. Release of short-term or localized nomograms could be exploited because short-term transmission changes are not recognized by the current CPA or LMPM processes.

- **Do Not Support Detail Generation or Transmission Outage Reporting**

PG&E has concerns about reporting detail outage information. As explained above, this information, like other short-term transmission system data, could be exploited because short-term transmission changes are not recognized by the CPA or LMPM processes. PG&E is open to considering some form of aggregated outage reporting, but the value of aggregated information may be limited.

## **2. Comparable Timing of Market Data**

- **Support the Concept That Public Data Should Be Available to All Market Participants at the Same Time**

As a general principle, PG&E supports the idea that public data should be received by all Market Participants at the same time. There would appear to be two options to achieve this. The first would be delaying notice of prices to generators until after they have received their 5 min. dispatches. The second option would be to release price information sooner to the general market community. PG&E welcomes the opportunity to review the CAISO's proposal on which of these options it prefers.

## **3. Release of CRR Bid Data**

- **Do Not Support Release of Full CRR Bid Sets**

The issue paper suggests releasing CRR bid data on a post-90-day basis, as is done with energy bids. Though it is true that energy bids are released on this time frame, releasing CRR bids could make public a much greater amount of potentially proprietary information.

Unlike the awards in the energy market, the awards in CRR market are public. Moreover, masked CRR bids would presumably contain source and sink information. The public awards along with the source and sink information would allow for easy mapping of the CRR bids to the CRR awards and provide much more transparency than currently exists in the energy market with the potential of revealing proprietary information.

○ **Request Specific Detail of CRR Data Release in Other Markets**

Some stakeholders have asserted that other markets release more CRR bid data than the CAISO. To assist the discussion, PG&E requests that the CAISO research and provide to stakeholders information on what CRR data is released in other markets. For instance, do other markets release unmasked awards and masked economic bids with location data? Moreover, there may also be fundamental differences in how other markets operate that make releasing different types of information more or less appropriate.

**4. Release of Variable Energy Resource (VER) Forecasting Data**

○ **This Discussion Should Be Part of the Reforms to PIRP**

The release of VER forecasting data is more appropriately addressed in Phase 1 of the Renewables Integration Initiative. The CAISO released a Straw Proposal on December 22, 2010 in which changes to PIRP are proposed. We recommend moving this discussion from the Data Release Initiative to the Renewable Integration Initiative.

**5. Data Not Included in the Issue Paper**

○ **Request Release of RTPD Data**

In the working group discussion, PG&E requested that more transparency be provided for the RTPD unit commitment process. Specifically, PG&E would like the CAISO to report in OASIS, RTPD energy prices and the system load and resource schedule totals for the RTPD (i.e., export, import, generation and load).