

**Stakeholder Comments on:  
CAISO Straw Proposal Data Release Phase 3**

Submitted by	Company	Submitted Date
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Southern California Edison "SCE" appreciates the opportunity to participate in the *Data Release & Accessibility* stakeholder process and to submit comments on the CAISO's Straw Proposal for Data Release Phase 3, dated February 1, 2011. SCE provides comments on (1) Release of Additional Market Model Data, and (2) Release of Day-Ahead Full Network Model.

**1. Release of Additional Market Model Data**

In the straw proposal, the CAISO proposes to release the following market model data. SCE supports release of the additional day-ahead market model data since this will enhance the market efficiency. Below are SCE's comments to each of the proposed data item.

1) Release of Day-Ahead Load Distribution Factors

SCE supports the release of the actual day ahead LDFs after the day ahead market closes as proposed by the CAISO.

2) Release of Day-Ahead and Real-Time Shift Factors

SCE supports the release of day-ahead shift factors by binding constraint relative to all pnodes with non-zero shift factors after the day-ahead market closes. The day-ahead report should include the constraint, node, and shift factor for each hour. SCE also supports the release of real-time shift factors by binding constraint relative to all pnodes with non-zero shift factors after the real-time market closes. The real-time report should include the constraint, node and shift factor for each 5-minutes interval as proposed by the CAISO.

To allow participants to fully validate the CRR settlement rule under convergence bidding and better analyze the CAISO markets in general, SCE also requests the CAISO to release the shift factors for the HASP market where interties are currently settled. The HASP report should include the constraint, node and shift factor for each 15-minutes interval.

3) Transmission limits for additional internal constraints and Bus IDs for transmission outages

SCE supports the release of TTC, CBM, and OTC data for all internal branch groups and market scheduling limits that are enforced in DAM, and actual limits for all individual transmission facilities that are enforced in DAM.

SCE supports the CAISO to improve the daily Transmission Outage Reports by adding the "To Bus" and "From Bus" to the existing report to allow for easier mapping to the CRR full network model.

As stated in our comments to the Issue paper, in general, SCE supports enhancing the transmission outage reports to include additional information that is available to the CAISO, if it is determined that there is no confidentiality issue and with the stipulation that no additional reporting obligations are imposed on the Transmission Owners in order to make this information available.

4) Aggregated generation outage data on trading hubs

SCE reiterates that any aggregation data regarding generation outage can be released only to the extent that one can not relate the released outage information to specific resources.

That being said, SCE opposes the release of aggregated generation outage by trading hub and by fuel source at the same time as proposed by the CAISO. For example, one could tell from such information whether SONGs units are outage by looking at generation outage data at SP15 and the fuel source being nuclear; this would not be consistent with the policy that release of generation specific data should not be allowed.

5) Wind and solar forecasting data by trading hub

SCE supports the CAISO to release aggregated wind and solar forecasting data with the anticipation that it will not incur significant costs to implement. If the CAISO foresees that the implementation cost including the payment of the forecasting fee is significant, SCE encourages the CAISO perform a cost assessment and provide additional details for upcoming stakeholder discussion.

6) CRR bid data

SCE supports the CAISO to release the CRR bid data with the entity being masked in the data.

**2. Release of Day Ahead Full Network Model (also known as PSS/E raw files or topology files)**

During the Data Release Phase 1 and Data Release Phase 3 stakeholder process, SCE has been requesting the CAISO to release the actual day-ahead full network model used to clear the day-ahead markets to market participants.

As stated in Straw Proposal, the CRR Full Network Model (FNM) data released by the CAISO today has approximately 6-week time lag to the actual network model utilized for the day ahead and real time markets. Further, the CRR FNM released today only includes -one snapshot of the system for a season/month, while the day-ahead markets utilize hourly system snapshots to clear the markets. In addition, the CRR network model is a simplified DC model whereas the day-ahead model is an AC model.

Under convergence bidding, some issues that are unique to the day-ahead market and virtual bidding behavior, such as AC convergence issue which can have impacts on LMP prices & LMP components, can not be simulated and analyzed through the CRR FNM data released today.

Due to these reasons, the CRR network model is very limited for market participants to simulate the day-ahead markets. To enhance market efficiency, SCE requests the CAISO to release the actual day-ahead FNM to market participants.

In the SCE's view, the day-ahead FNM provides a description of grid network topology separate from bids prepared *before* the market runs, and it's not obvious that those files contain any confidential bid information. Given that the CAISO publishes generation and transmission outages on a daily basis, that the CAISO releases market participants' bids after 90 days, and that the CAISO publishes the CRR FNM, SCE believes there should not be any concern over releasing the actual day-ahead FNM.

SCE continues to believe that confidential bid information will not be released with the FMN. However, if CAISO can demonstrate that releasing the day-ahead FNM will expose bidding data then SCE encourages the ISO to propose 1) a release schedule that meets the needs of the market as a whole or, 2) release the day-ahead FNM data with confidential bid information masked.