

Submitted by	Company	Submitted Date
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Southern California Edison Company (“SCE”) provides the following comments on the California independent System Operator’s (CAISO’s) draft language Transmission Constraints Amendment Filings, dated July 8, 2009. SCE has reviewed the draft tariff language and requests the CAISO provide additional transparency to market participants on transmission constraints and transmission biasing in market runs. Additionally, SCE would like additional clarification on the markets that will utilize the enforced transmission constraints used in the All Constraints Run (ACR).

Transparency to the Constraints Enforced in market runs

SCE request the CAISO provide additional transparency to market participants as to the transmission constraints incorporated into the Full Network Model. In particular, SCE requests the CAISO provide (1) the list of the constraints that are enforced in the CAISO market processes (2) the list of the constraints that are not enforced, and (3) the list of the contingencies that are enforced in the market process. Also SCE requests the CAISO to provide more transparency on the practice of transmission biasing and document the criteria used to determine whether a transmission line should be biased and the guidelines on magnitude and duration of adjusting the transmission lines market limit. Understanding the expected set of enforced constraints will provide stakeholders with the necessary information to analysis market results and not introduce overly burdensome data requirements on CAISO staff.

Clarification of Section 31.2.1

Language has been added to section 31.2.1 that states “The second run is the All Constraints Run (ACR), during which all transmission Constraints that will be enforced in the Integrated Forward Market are enforced”. This language appears to clarify that the set of constraints enforced by the ACR will be the enforced constraints used in the IFM optimization. However, tariff change to the definition of All Constraints Run (ACR) states that the enforced constraints used in the ACR run will be enforced in the market-clearing process (IFM, RUC, STC, RTUC, and RTD). SCE requests the CAISO clarify whether the same set of enforced constraints are used throughout the market clearing process proposed in the definition of All Constraints Run or does the CAISO intend of only limit the enforced constraints from the ACE run to the IFM market process, which is implied by the propose changes to section 31.2.1.