

## Western Power Trading Forum Data Release Phase 3 comments

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WPTF appreciates the opportunity to submit these comments on the CAISO's December 10, 2010 Issue paper. WPTF offers comments in a number of areas.

### Overall Phase 3 Process

WPTF seeks further clarification from the CAISO about the Phase 3 transparency process. The CAISO's process seems unclear as to what changes will be considered and what bases – if any – would cause certain data to not be released. WPTF's position is that the CAISO's default process should be to publish all data, unless the data explicitly requires confidential treatment. Where sequencing and prioritization is necessary, implementation priority should be given to data found valuable by the market participants. WPTF asks the CAISO to provide very explicit ("transparent") feedback with respect to each data request, in particular indicating whether the CAISO believes the data needs to be protected and if so under what category of protection.

WPTF also asks that the CAISO generally describe how implementation considerations will be addressed as part of the data requested in this Phase 3 process. Are there limitations to the extent of the changes that can be made at this time? If so what are those limitations and how will the CAISO work with stakeholders to identify the changes to be made in this Phase 3 effort as opposed to those that need to be delayed? (Our understanding was that Phase 3 was the "catch all" of the outstanding data requests.) WPTF asks that the CAISO be very explicit with respect to requested items if there are implementation challenges that prevent a data item from being implemented at this time.

The CAISO's draft "Data Release Implementation Process" states that the "process begins when the market participant initiates and submits a Data Request to the CAISO." This approach presumes a gap in transparency that is filled only after a market participant identifies the gap, and submits a data request. This is inefficient on its face. The CAISO's vision is focused on transparent market mechanisms and "high-quality information for the benefit of our customers." Consistent with that vision, the CAISO should include full and complete transparency of data, processes and results (subject to limits of confidentiality based on objective criteria) as a design principle at the outset of planning any new market system or any significant revisions to an existing system.

Lastly, with respect to the ongoing data release process, WPTF would also like further clarification. WPTF does not believe the CAISO's role should be to "determine whether or not the data is necessary to increase market efficiency". Rather if market participants have requested certain data, and the data does not require protection under CEII, data the CAISO should simply facilitate stakeholders' prioritization of the provision of that data.

### Early Board Action

WPTF encourages consideration of early board action on the data release policy. In particular WPTF asks that the CAISO take to the board those items for which there is a high level of consensus on data release, including the release of improved outage data, market shift factors and CRR bid data. WPTF is less confident that the CAISO's overall data release policy is ripe for Board approval. Rather further work on the balance of the policy of provision may warrant keeping some aspects of the policy for the May board agenda.

### Bases for Confidential Treatment

There are three areas of confidential information referenced in the 2/01/11 white paper for which WPTF seeks more clarification, namely Transmission Planning Data, Reliability Data, and Proprietary data. Transmission Planning data and Reliability Data as defined by the CAISO overlap with Market Sensitive Data and Critical Energy Infrastructure Information (CEII) categories. WPTF believes it appropriate to protect commercially sensitive and proprietary transmission project information submitted by private parties. Any other bases for protecting transmission planning data should fall within the CEII basis. Similarly Reliability Data falls within CEII. The CAISO should either eliminate these categories as being redundant with Market Sensitive Data and CEII categories or clarify what other criteria warrants protection.

Lastly, WPTF requests that the CAISO clarify that the Propriety Data category only warrants protecting intellectual property that is not owned by the ISO but rather retained by vendors. WPTF understands that if the CAISO has negotiated arrangements with vendors. For example, as part of the pricing arrangements, the CAISO has agreed to the vendor's retention of aspects of the information, then such warrants protection. Beyond this, however, there is no reason to protect, non proprietary data. The CAISO is a quasi-public agency which should take the position with vendors that non proprietary aspects of contracts will be made public.

### Improved Transmission Outage Data – Expedited Release

WPTF strongly urges the CAISO to continue an expedited release of improved transmission outage data. WPTF has been working with the CAISO on this topic for a very long time, including approaching the CAISO with a proposal last year that had the support of a large set of market participants. For the expedited release WPTF is not asking that Transmission Owners be required to submit to the CAISO any additional information but rather that the ISO simply offer a more complete release of such information and offer improved labeling and organization of such data.

WPTF is concerned that despite the time that has passed since WPTF began requesting this data, the CAISO is only offering to provide a much abbreviated set of data. WPTF is again transmitting data templates to the CAISO as examples of the type and format that would be useful to market participants.

WPTF requests that the CAISO give our request consideration and respond if for some reason any particular data element is problematic for the CAISO to provide.

In Section 7.1.3 of the Straw Proposal, the CAISO states that “the ISO is not proposing additional release of information regarding nomograms and monitored constraints. The ISO believes the currently released information meets the need to allow market participants to adequately shadow the ISO’s market operations.” Unless the data is confidential based on objective criteria, the CAISO’s default plan should be to publish it. In this case, the ISO should justify why the release of temporary nomogram cause, definition and rating limit information could not be disclosed well in advance – rather than the current day-by-day practice. Assuming the temporary nomograms created for outages are planned upon receipt of the outage request, nomogram information should also be disclosed upon receipt of the outage request. This information could be easily included in monthly CRR file packages.

#### Load Distribution Factors (LDFs)

WPTF continues to encourage an expedited release of the market LDF data.

#### Transmission Line Limits and Market Shift Factors

WPTF strongly urges the ISO to provide access to the internal limits of the transmission constraints as soon as possible. If the CAISO believes it is not able to release this data the CAISO must provide transparency as to the basis for protecting this data. WPTF appreciates the CAISO’s willingness to provide the shift factors necessary to validate the CRR rule. WPTF also urges the CAISO to specifically indicate why it feels it cannot release all the shift factors but rather only the ones for the binding constraints.

#### CRR Bid Data

WPTF continues to urge the CAISO to release time-lagged CRR bid data. WPTF asks that the CAISO consider this for an expedited release.

#### Retention of CAISO Documentation and Web Site Posting

WPTF requests that the phase 3 process be expanded to address the CAISO’s policy regarding retention on its public web site of CAISO material such as papers and presentations. WPTF members have found that certain documents once posted are removed from the web site after some unspecified period of time or at a minimum are rendered very difficult to find. The CAISO should continue to act as a public repository for all documents. Not doing so requires that each market participant maintains a large information storage database in contrast to the CAISO maintaining a single repository. Including this issue in the Phase 3 process will ensure the policies of web site document maintenance have been vetted and are well known.