

Stakeholder Process: Phase 1 Transmission Constraints in the Data Release & Accessibility Initiative

Summary of Submitted Comments

Stakeholders submitted three rounds of written comments to the ISO on the following dates:

- Round One, 11/23/2009
- Round Two, 12/16/2009
- Round Three, 01/15/2010

Stakeholder comments are posted on the ISO website: <http://www.caiso.com/244c/244cae3b46bb0.html>

Other stakeholder efforts include:

- Conference Calls
 - 11/12/2009
 - 01/13/2010
- In-person meetings
 - 12/10/2009

Market participants that provided no comment on a particular topic are not listed in the matrix.

Management Proposal	Load Serving Entities, CPUC, Suppliers, Traders	Management Response (Completed by the ISO)
<p><i>Transmission Constraint and Contingency Lists in the Day-Ahead Market</i></p>	<p>Support</p> <p>Jan-15-2010: Dynegey, J.P. Morgan, PG&E, SCE, WPTF. All Stakeholders in this round of comments support the proposal, but would still like additional information.</p> <p>Specifically, stakeholders like the proposed data release but like to receive Transmission Limit data in the Transmission Constraint and Contingency Lists.</p> <p>Oppose: None</p>	<p>A number of stakeholders have expressed the desire to receive the actual transmission constraint limit values used in the various market runs. However, this issue warrants significantly more discussion due to the complexities of hourly variation, and in some cases operational linkages to conditions outside of ISO Balancing Area, and associated sensitivity, the ISO proposes to consider the release of limits, beyond Path limits already provided in OASIS, in Phase 3.</p>
<p><i>Cause of Binding Constraint</i></p>	<p>Support</p> <p>Jan-15-2010: Dynegey, J.P. Morgan, PG&E, SCE, WPTF. All Stakeholders in this round of comments support the proposal, although some have clarifying questions.</p> <ul style="list-style-type: none"> J.P. Morgan: Would the proposal provide hourly shadow price information on binding constraints? <p>Oppose: None.</p>	<p>There is broad support for the release of the Binding Constraint Cause data. Other ISOs currently provide this information and ISO stakeholders would like to receive it for ISO markets.</p> <p>The ISO proposal would provide hourly shadow price information on binding constraints, as well as at other granularities (e.g., for real-time intervals) for the OASIS reports listed on slide 31 of the Jan-13-2010 Presentation, http://www.caiso.com/271b/271bf2e05b80.pdf</p>
<p><i>Use of the Conforming Constraint Report for the Day-Ahead and Real-Time Markets</i></p>	<p>Support</p> <p>Jan-15-2010: Dynegey, J.P. Morgan, PG&E, SCE, WPTF. All Stakeholders in this round of comments support the proposal, although some have clarifying questions and/or suggested refinements.</p> <ul style="list-style-type: none"> Dynegey: The ISO should provide conforming constraint information for both the day-ahead and real-time markets, as well as the degree of those adjustments. <p>Oppose: None.</p>	<p>Conforming Constraints Reports will be provided for both the Day-Ahead and Real-Time Markets, including real-time pre-dispatch (RTPD) and real-time dispatch (RTD). The Revised Draft Final Proposal http://www.caiso.com/2718/2718ef3844a00.pdf at page 8 and the Jan-13-2010 Presentation at Slide 20, http://www.caiso.com/271b/271bf2e05b80.pdf both stated that Conforming Constraints Reports will be provided for the DAM and RTM.</p>

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<p><i>Advance Notifications for Planned Market Model and/or Constraint Enforcement Changes</i></p>	<p>Support</p> <p>Calpine, Citi-Barclays-RBS (Joint Parties), DC Energy, Dynegy, J.P. Morgan, Morgan Stanley, Powerex, RRI, SCE, Shell, and WPTF.</p> <ul style="list-style-type: none"> • Dynegy supports the ISO’s proposal to provide advance notification of changes to the constraints included in the ISO’s market systems. Dynegy understands that there may be circumstances in which the ISO cannot give the promised ten-day notice, but hopes that such circumstances are infrequent. (Comments, 01/15/2010). • Shell: The need for advanced notifications is highlighted by the recent implementation of the SCE_PCT_IMP_BG constraint in the SP15 area with no prior notification to market participants, which caused sudden extreme price volatility. (Comments, 11/23/2009). <p>Oppose: None.</p>	<p>The ISO understands that the unexpected enforcement of the SCE Import Constraint caused unexpected market outcomes that significantly affected many stakeholders. In their 11/23/2009 comments, Joint Parties describe the impact of this event, which can be avoided in the future through the use of the proposed advance notifications:</p>
<p><i>Commitment to the Development and Use of Improved Network Terminology and Nomenclature</i></p>	<p>Support</p> <p>DC Energy, Dynegy, J.P. Morgan, RRI, SCE.</p> <ul style="list-style-type: none"> • DC Energy: In NYISO, facilities are provided with a unique identifier that is integrated across both outage and constraint management systems. If a facility is down for outage work, the outage file indicates that that facility is not available; if the same facility is an enforced limit element in the published constraint file, that same number is used in the outage posting. DC Energy encourages the CAISO to look for similar 	<p>Although not all parties weighed in on this with written comments, there is broad support for improved Network Terminology and Nomenclature. The ISO appreciates the specific suggestions offered by stakeholders.</p>

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	<p>linkages and build similarly robust and integrated systems. (Comments, 11/23/2009)</p> <ul style="list-style-type: none"> • Dynegy: ERCOT has improved correspondence between IFM breaker switch models and CRR/Planning bus models through the use of pseudo bus-bars (or phantom bus-bars). <p>Oppose: None.</p>	
<p><i>Permission to use the Congestion Revenue Rights Full Network Model (CRR FNM) for purposes of analyzing and participating in all ISO markets</i></p>	<p>Support</p> <p>Calpine, SCE, Shell, and WPTF.</p> <ul style="list-style-type: none"> • Shell: The goal of an RTO operated open market is to establish rules in which a competitive process will bring system energy and new generation resources to consumers at the lowest achievable cost. The ISO presently provides a full network model (FNM) to market participants only for the purpose of modeling CRRs. The ISO requires market participants to agree to a Confidentiality Agreement that restricts usage to only modeling CRRs. These limitations prohibit market participants from other types of analysis, such as using the FNM to evaluate locations where new resources such as peakers might be sited. <p>Oppose: None.</p>	<p>The proposal squarely addresses the concern expressed by Shell, which is shared by many other stakeholders.</p>