

## DC Energy Comments on Phase 1: Transmission Constraints Data Release

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DC Energy appreciates the opportunity to provide comments on Phase I of the CAISO's data release issue. DC Energy encourages the CAISO to be as transparent as possible with respect to how they operate the transmission system and elect to release data and, from the outset, applauds the transparency surrounding the launch of this initiative.

DC Energy supports the comments filed by the WPTF, as well as those filed by Citigroup Energy Inc., Barclays Capital, and RBS Sempra (referred to as the "Joint Parties"). DC Energy strongly supports the Joint Parties' comments asking for increased data release, including listing of possible and enforced constraints, non-public processes and procedures, and transmission maps. DC Energy believes that the suggestions the Joint Parties make would increase market participant confidence in the CAISO administered markets. When the CAISO plans to implement new procedures or change existing ones, DC Energy believes the CAISO should provide advance notice to the market.

To address a finer point, DC Energy strongly suggests the CAISO consider all aspects of the data release process as it begins to implement greater transparency around its constraint management. For example, in the NYISO market, 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 linkages and build similarly robust and integrated systems. DC Energy urges the CAISO to develop consistent and intuitive formatting for the data that it releases.