

Comments on Data Release and Accessibility Phase 1: Transmission Constraints Draft Final Proposal
Submitted by Dynegy – January 15, 2010

Dynegy greatly appreciates the CAISO's efforts to provide greater transparency into its transmission constraint enforcement practices. Dynegy further appreciates the opportunity to submit these comments.

In general, Dynegy supports the CAISO's proposal, with two exceptions in which Dynegy requests the CAISO provide additional information:

1. **The Conforming Constraint Report.** The CAISO has proposed to provide through a Conforming Constraint Report, published either weekly or monthly, information that would provide "insight on the number and degree of manual adjustments to transmission constraints within the ISO controlled grid." Draft Final Proposal at 3. Dynegy commends the CAISO for committing to provide this information. However, the Draft Final Proposal also refers to table 5.1 from the October 30, 2009 Department of Market Monitoring Quarterly Report on Market Issues and Performance. From this reference, Dynegy assumes the Conforming Constraint Report the CAISO intends to publish will consist of the same information in Table 5.1. However, that table provides only the percentage of hours in which transmission paths were biased in the real-time market. In contrast, the CAISO's Draft Final Proposal indicates the CAISO will provide information on both the number and *degree* of manual adjustments. Dynegy requests that the CAISO also provide information on the degree of adjustments if the CAISO uses Table 5.1 as the template for this report. Moreover, Table 5.1 provides – and the CAISO's Draft Final Proposal offers to provide – information only from the real-time market. However, conforming adjustments could also be made in the day-ahead market. Dynegy requests that the CAISO provide conforming constraint information from both the day-ahead and real-time markets. Finally, consistent with the proposed binding constraint information, the CAISO should provide the reason for the adjustment.
2. **Transmission limits.** The daily constraint lists the CAISO offers to publish (e.g., Tables 1, 3 and 4) provide useful information, but should also include the value of the constraint limit, even if the limit is not enforced. Additionally, the column "TAC area" in Table 4 seems of little benefit if the equipment station and equipment name are clearly identified, and could be omitted.
3. **FNM Associations and Release.** It is not clear how the daily releases of info will be associated with each new release of the FNM (e.g., each FNM release is tailored to a corresponding future CRR auctions with relevant system changes in load, generation, transmission, etc.). Will the FNMs released for the forward markets be the same or different from those released for the CRR markets, and if different, what will their frequency of release be?
4. **Network Terminology and Nomenclature.** An issue may arise as to how will breaker/switch models of the IFM correspond with the CRR bus models. Will there also be a correspondence with planning bus models? Dynegy has observed that much effort was spent in the ERCOT market design to resolve a correspondence between IFM breaker switch models and CRR/Planning bus models. A method was developed (and designed into the Siemens software) that introduced the concept of pseudo bus-bars (or phantom bus-bars). A bus, within this

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method of implementation, is defined as a collection of station level bus-bars (elements) electrically connected by switches and breakers and interconnected to other buses by branches and transformers. Each bus-bar is named according to a specific convention and has an instantiation priority. The bus-bar name in a bus collection with the highest priority (often a metering point) is used to name the bus. The other bus-bars in the bus are invisible (phantoms) unless instantiated by a breaker/switch operation. If, in the IFM breaker/switch model, a breaker/switch event occurs that splits a given bus into two new buses, for instance, then the new buses are named according to the highest priority bus-bars in the new collections of bus-bars that make up the newly split buses. One bus would retain the old bus name (before the split) and the other bus would have a new name (derived from the bus-bar with highest instantiation priority in that bus' new collection of bus-bars).

With the exceptions noted above:

- Dynegy supports the CAISO's proposal to publish information on binding constraints, and supports the format proposed by SCE for publishing shadow prices.
- Dynegy supports the CAISO's proposal to provide daily constraint lists.
- Dynegy supports the CAISO's proposal to provide advance notification of changes to the constraints included in the CAISO's market systems. Dynegy understands that there may be circumstances in which the CAISO cannot give the promised ten-day notice, but hopes that such circumstances are infrequent.
- Dynegy supports the FNM being made accessible to DA, HASP, and RT markets in addition to the CRR Markets.
- Finally, Dynegy supports the CAISO's proposal to adopt consistent and more descriptive nomenclature.