

## Stakeholder Comments on:

### CAISO Issue Paper Data Release & Accessibility Phase 1

Submitted by Submitted	Company	Date
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ECCO International, Inc. (ECCO) appreciates the opportunity to participate in the Data Release and Accessibility stakeholder process and to submit comments on the CAISO's Issue Paper for Data Release & Accessibility Phase 1: Transmission Constraints, dated November 5, 2009. ECCO fully supports the CAISO's efforts to provide transparent and timely information to all market participants as it relates specifically to the network configuration and constraint enforcement. This information is critical to all participants and to those that support participants in their effort to provide reliable, low cost resources into the CAISO markets while hedging their collective risk.

ECCO is providing comments on:

- Constraint Enforcement Practices:
- Constraint & Contingency Lists: and
- Other comments/questions

**Constraint Enforcement Practices** – Recently there was a decision made to include a constraint “SCE\_IMP\_PCT\_BG” in the market applications instead of resolving any congestion using methods outside of the normal dispatch solution. ECCO supports such a move of software enforcement of defined constraints. The problem however is that there needs to be a process of introducing identified constraints into the market applications that make this information available to the market participants. Any newly introduced constraint should be released to the participants in the latest version of the FNM at least 30-days prior to implementation. The purpose for release of this information would be to allow participants the opportunity to manage their exposure to any congestion which may result from software enforcement that they were not previously considering. In addition the CAISO should make all pertinent information related to this new constraint such as method of enforcement. For example if a new constraint is not a simple thermal loading limit that value should be included. Any external formulation that contributes to the setting of a limit should be made public, at a minimum to those participants cleared by the CAISOs rigorous Non-Disclosure Agreement (NDA) process related to the FNM. In other words, if a limit is based upon a specific load, import or supply loading this methodology should be included in the FNM release notes ReadMe file.

**Constraint & Contingency Lists** - Additionally all constraint definitions that are currently contained in the appendix of M405-A, should also be publicly available to the NDA signatories. Currently this information is not readily available.

**Other comments/questions** – On page 14 of 25 under “*What is adjusted*” it states: “Margins for purposes of conforming limits are only applied to market operating limits for certain branch groups (flowgates/transmission interfaces).” What are the procedures associated with these margins, when are they applied and is the market notified upon application in the IFM and RT processes?

Manually enforced constraints external to the dispatch: When this occurs an automatic market notice should be posted to all participants on the OASIS. In this way, participants can follow any developing trends and adjust accordingly.

ECCO fully supports the CAISO enhancing the binding constraints and shadow price information currently posted on OASIS by adding the “contingency” similar to the way it is provided by the NYISO and PJM, for example.