

PG&E Comments

Data Release & Accessibility - Phase 1

Submitted by		Company	Date Submitted
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Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the stakeholder process for Phase 1 of the CAISO’s Data Release initiative and to submit comments regarding the January 6th, 2009 Draft Final Proposal and the January 13th, 2009 CAISO Presentation.

PG&E recognizes the hard work the CAISO has put into the development of this initiative and we believe that the proposed data release represents a significant improvement to market transparency.

Data Release Timeline

1. Support Proposal for Both Pre and Post Market Data Releases: The release of FNM data prior to the running of the market is a concern because of the potential that this data might be used to manipulate the market. Accordingly, PG&E has some unease about the release of FNM data before the running of the Day Ahead market. On the other hand, PG&E recognizes the benefits from an overall increase in market transparency. Moreover, PG&E acknowledges the protection afforded by LMPM and believes some of the risk associated with the pre-market data release may be mitigated by providing the data to all market participants. This should increase the opportunity for other participants to take actions that could reduce the impact of manipulative behavior. Therefore, on balance, PG&E is supportive of the pre- and post- market data releases as outlined in the proposal.

Conforming Constraint Report

2. Support Weekly Release of Report with Indications of Reason for Adjustments: In the executive summary of the Draft Final Proposal, it appears that the CAISO was at one point considering releasing this report on a weekly basis. While we understand the current proposal is for a monthly release, we believe weekly reporting would help market participants better understand market results and support a weekly release.

An additional element we would like to see in the conforming report is an indication of why each transmission element was adjusted. For instance, the CAISO has explained there are two main reasons it performs adjustments: 1) for conforming reasons and 2) to create reliability margins. We recommend the CAISO indicate for each constraint why an

adjustment was made. This could easily be achieved by adding another column to the proposed report filled with one of those two definitions. Having this information would help market participants track the reasons for limit adjustments and confirm that instances of conforming adjustments are being reduced as the market model improves.

Additional Comments

3. Request Publication of Nomogram Limits in CRR FNM: On the January 13th conference call the CAISO clarified it did not intend to release any limit information, including nomogram limits, in this proposed data package. This approach is acceptable for transmission corridors and flowgates because the limits can be found in the CRR FNM. PG&E suggests that the CAISO also publish the nomogram limits in the CRR FNM releases. This would be a simple method to release the nomogram data in a similar fashion as the other limit data.

4. Request Indication of IFM or RUC Enforcement Status for All Tables: The current Draft Final Proposal seems to indicate that the enforcement status of a line can either be “Yes” or “No”. However, on the January 13th conference call, the CAISO seemed to be amenable to changing this to include four potential options: IFM, RUC, Both or No. We encourage the CAISO to make this change before bringing the proposal to the Board in February.