

Stakeholder Comments Template

Subject: Data Release and Accessibility Phase 1 Issue Paper

Submitted by	Company	Date Submitted
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Powerex appreciates this opportunity to provide comments on this Issue Paper and encourages the CAISO to work diligently to ensure that their policies and practices on Data Release be modeled after best practices by other RTO/ISOs.

In addition to the specific comments below, Powerex has reviewed a copy of the comments being filed with the CAISO by Joint Parties (Citigroup Energy Inc., Barclays Bank, PLC, and RBS Sempra) and is in general agreement with the Joint Parties comments.

Constraints and Contingency Lists

Powerex encourages the CAISO to provide transparency in their Constraint and Contingency Lists by publishing the following:

- A comprehensive list of constraints and contingencies by intertie, flowgate, nomograms, or other transmission element;
- The sub-set of the above list of constraints and contingencies that is enforced in each market, DA, RUC, and RT;
- The sub-set of the above list of constraints and contingencies that is unenforced in one or more markets; and
- The sub-set of the above list on constraints that is enforced outside of the markets by CAISO Operations or may be modified at the discretion of CAISO Operations.

Powerex understands that some information may be confidential but Powerex strongly suggests that publishing, on a timely basis, whether a constraint is enforced, unenforced, or changed is important to the efficient functioning of the CAISO markets. Either of the CAISO's proposals – Creation of a Daily All Constraints List or Creation of a Default Constraint List with an incremental Daily Change Report – if comprehensive and timely, would probably address this concern.

Powerex also believes that the CAISO should coordinate any major changes to the list of constraints that are enforced within its markets with information released to market participants. The current lag between the DB-xx used in the FNM for the CRR process and DA/RT markets is unacceptably long. As part of this stakeholder process, the CAISO should develop a more formal process and timeline for the release of this data.

Constraint Enforcement Practices

Powerex believes the CAISO should formalize its constraint enforcement practices and publish all constraints that were adjusted or modified by CAISO Operations. While the CAISO has published a technical bulletin describing the principles and practices to better align market flows with actual flows and setting reliability margins, the CAISO has not published or made public the results of these practices as they occur on a timely basis.

Powerex does not object to CAISO Operations using their best efforts under these principles and practices to ensure reliable operation but Powerex believes that market participants should know the impact of these operational adjustments. Furthermore, Powerex strongly believes that Price Correction should not be employed to “second guess” CAISO Operations when these adjustments are made. If the CAISO believes that the adjustments were not valid, the CAISO should update its practices not change market prices after the fact since market participants have already responded to these price signals.

Information on Binding Constraint and Cause

Powerex strongly encourages the CAISO to adopt best practices from other RTO/ISOs. An OASIS posting showing each binding constraint and whether it occurred for the base case or a specific defined contingency would be extremely helpful if provided on a timely basis. For instance, PJM provides good information in real-time as constraints occur and then at the end of the day summarizes the information on all constraints that occurred.