

Shell Energy North America
Comments on: Data Release & Accessibility
Phase 1: Transmission Constraints
November 23, 2009

Shell Energy North America appreciates the opportunity to submit comments on the CAISO's Issue Paper Data Release & Accessibility, Phase 1: Transmission Constraints, November 5, 2009. Please address questions to Mike Evans, (858) 526-2103.

1. Provide Full Network Model and Nomograms to all Market Participants and allow use beyond CRR modeling – The goal of a RTO operated open market is to establish rules in which a competitive process bring system energy and new generation resources to consumers at the lowest achievable cost. The ISO presently provides a full network model (FNM) to market participants only for the purpose of modeling CRR's. The ISO requires market participants to agree to a Confidentiality Agreement that restricts usage to only modeling CRRs. These limitations prohibit market participants from other types of analysis, such as using the FNM to evaluate locations where new resources such as peakers might be sited. We suggest that the ISO establish a process to allow for broader distribution and use of its FNM. The FNM needs to also include data that describes nomogram constraints.
2. Notify Market Participants prior to CAISO Changes to the DA and RT FNM – We encourage the CAISO to establish a process to provide advance notice to market participants of changes to the DA and RT IFM. This need is highlighted by the recent implementation of a constraint in the SP15 area referred to as SCE_PCT_IMP_BG with no prior notification to market participants, which had to, after the fact, learn that sudden extreme price volatility had been caused by a change to the model which now treated a constraint as a “non-competitive” path.
3. Nomogram Constraints – The ISO should make available data associated with how it operates nomograms. In particular, when the CAISO has nomograms which do not have consistent operating limits year round, the CAISO should make available to market participants data on how those nomograms change during the year.
4. Notify Market Participants of Impending Constraints, or Constraints presently being managed by Exceptional Dispatch – The CAISO has been managing some grid constraints through Exceptional Dispatch, as opposed to modeling as “non competitive” paths. It would be helpful to the market for the CAISO to indicate those constraints which are presently managed by ED, and to indicate a schedule for moving those constraints over to a non-competitive path dispatch process.