

## Western Power Trading Forum Comments on Phase 1: Transmission Constraints Data Release

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WPTF appreciates the opportunity to provide comments on the CAISO's data release issues. WPTF would first like to acknowledge that many of WPTF's members have submitted detailed comments on this issue. WPTF has knowledge of many of those comments, including those of the Citigroup/Barclays/RBS Sempra, Dynegy and Morgan Stanley. WPTF supports the points raised and observations within those comments and has not endeavored to reproduce those points in these comments.

WPTF rather encourages approaching the data release process in a very holistic manner. The CAISO's markets, and its pursuant operations, will work best if the maximum amount of information is available to market participants. The CAISO should therefore take the burden of proof and start with the presumption that all data, policies and actions should be made available to market participants unless the CAISO can demonstrate that security would be jeopardized should any individual data be made available. Under that presumption the CAISO can propose the practices that are needed when following any data that it demonstrates is confidential or is otherwise in need of being controlled. Adoption of such guiding principles will yield the following results, for example.

1. Release of all transmission constraints and contingencies and release of a 30-day notice plan for changes to enforced constraints and contingencies.
2. Notification prior to the CAISO's other changes to the market model and detailed follow up after the changes have occurred.
3. Release of all policies for operator biasing of, or non-enforcement, of such constraints.
4. Fully automated OASIS information for transmission constraints that the CAISO and stakeholders ultimately believe requires variation in their enforcement or limits on a frequent basis.
5. Notification when the CAISO believes additional contingencies need to be enforced and inclusion of those contingencies and the resulting changes to constraints in #4 above.
6. Complete information about those aspects of the CAISO network model and operations that cannot be released publicly, including the detailed basis for the confidentiality and the parts of the CAISO network or operations affected.

WPTF strongly encourages the CAISO to abandon the belief that it may provide additional data on a piecemeal basis after stakeholders have proved a business case for the provision of such data. What is needed is a recognition within the CAISO that significantly more information and more timely information is required to keep the market place apprised of the market's operations, and the market model for example. The CAISO is making decisions on a daily basis that affect the market dispatch and

pricing yet are entirely unknown to market participants.<sup>1</sup> A significant change in approach toward openness will ensure that there is depth to the CAISO's market participant and will reduce the costs of bringing energy to serve load in California.

The CAISO should take from the best in breed of other ISOs<sup>2</sup> regarding data release and use this as a starting point for its data release policy considerations. From this point the CAISO and stakeholders can discuss any additional California-specific features that are required.

Does the CAISO believe that every operational action it takes should create some kind of meaningful and transparent price signal? If not, why not?

The CAISO should provide all information relevant to the conduct of its respective day-ahead, HASP and real-time markets. Wherever possible this information should be posted well ahead of the market to allow informed decision making by SCs for the market. To the extent the CAISO has to make subsequent changes to the market model or operational changes that affect the markets, the CAISO should provide notice to SCs of those changes as soon as possible.

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<sup>1</sup> Dynegey in its comments raises some interesting questions, the answers to which are likely to reveal the CAISO's perspectives and potential biases with respect to information release. See Dynegey comments p. 1, for example raising questions such as: "Does the CAISO believe that every operational action it takes should create some kind of meaningful and transparent price signal? If not, why not?"

<sup>2</sup> The comments submitted by Citigroup et. al. provide a good summary of best practices in ISO data release.