

WPTF

**Phase 1 – Transmission Constraints
Phase 2 – Convergence Bidding
Comments**

Submitted By	Company or Entity	Date Submitted
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WPTF appreciates the CAISO's willingness to explore providing additional market transparency.

WPTF offers the following comments.

Transmission Constraint Information Release

- As expressed during the 12/10 meeting, WPTF finds it very important that the CAISO post the constraints that it expects to enforce in its markets prior to the running of the markets, perhaps consistent with the TD-5, TD-2, and TD (e.g., 5 am) timelines. Certainly, posting after-the-fact of the constraints enforced is important as well, and we recognize that changes may take place between these respective postings.
- In addition to the listing of constraints being enforced, it is critical that the limits of the constraints be published. Ideally the CAISO will publish the physical limit (i.e., reflective of any physical derates) and separately publish any adjustments the CAISO made to the limit in anticipation of different actual system flows.
- WPTF also believes it is important that the CAISO post explanations about the changes to the Base model such that participants can understand why a line is monitored or not monitored or why the limit was changed.

Tariff Language Changes

- WPTF continues to believe it important for the CAISO to resolve the root causes in the market model such that ad hoc changes to the model are not necessary.

The CAISO's tariff language should include provisions for ongoing and regular reviews by the CAISO to resolve issues requiring frequent changes.

- As indicated during the stakeholder meeting, WPTF encourages the CAISO to begin diligent efforts to develop a workable NDA for the purpose of releasing any of the operational network model to the extent an NDA is warranted. The use provisions of the NDA must be broader than those of the CRR network model.
- The CAISO should clarify that it will use engineering analysis to determine whether or not to enforce the constraints and, if enforced, the constraint limit. The CAISO should also indicate in the tariff language that it will make public the procedures it uses to determine whether or not to adjust constraints including whether or not to enforce an individual constraint.

Convergence Bidding Information Release

- WPTF supports information release of virtual transaction cleared quantities consistent with those information release policies for other transactions.

Convergence bidding market results will be business sensitive to virtual participants as the cleared quantities will reveal the locations that bidders found commercially beneficial. Releasing this commercially sensitive information would be as damaging to virtual participants as would releasing bid information for physical participants. Releasing the information after three months ensures that the information is provided to all market participants without giving away competitively valuable information.

While parties have argued that releasing the information will encourage virtual participation, it may have the opposite effect by discouraging experienced convergence bidders from entering the market if the CAISO is unwilling to protect their confidential information.

For these reasons, node-specific information should be protected consistent with the protection afforded to other transactions.

- WPTF does not believe that sufficient bases have been offered for the need for the immediate need for this commercially sensitive information.

No other market releases location-specific information about virtual bids immediately after the market closes. (Rather the releases are after, for example, 3 month's time as with physical bid information.) Further, there is no indication that protecting this information has had an adverse effect on the competitiveness of those convergence bidding markets. Should the CAISO feel it necessary to further consider this information release WPTF encourages the CAISO to consult other market operators and other market monitors in order to collect empirical information about the other virtual markets and to determine whether in these

other markets there was any detrimental effect from not releasing the information. The CAISO should not release the cleared quantities following the close of the day-ahead market without strong justification for doing so.