

Powerex Corp.

Data Release & Accessibility Phase 2: Convergence Bidding Data Release Comments on Draft Final Proposal

Submitted By	Company or Entity	Date Submitted
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Powerex appreciates the opportunity to comment on the CAISO's Phase 2: Convergence Bidding Data Release Draft Final Proposal.

Powerex supports the CAISO's proposal to publish convergence bid information on a 90-day lag, the same timeline as for physical bid information. However, Powerex strongly suggests that the bid data, convergence and physical, be released with significantly more transparency and detail.

Specifically, Powerex recommends that the CAISO release bid information (and associated awarded MW's) with the SCID masked and Resource ID replaced with TNAME, Region, and LAP for Intertie Bids, Generator Bids, and Demand bids, respectively. Powerex notes that the Interties are deemed competitive, therefore providing bid data at the Pnode level for Interties would not disclose competitive information. This level of detail and transparency would allow SC's to reconstruct the market solution and help identify any inefficiency in the market, and furthermore, is consistent with the data the CAISO historically published, pre-MRTU.

Powerex also supports the CAISO's proposal to publish a Day Ahead Supply and Demand Report for both Virtual and Physical schedules as illustrated in Table 3.

Powerex does not object to the CAISO's proposal to post net cleared virtual quantities by node at the close of the real-time market. However, Powerex believes that the CAISO should reconsider whether the CAISO should also post net cleared physical quantities by node for the same reasons the CAISO is proposing to post net cleared virtual quantities.