

Dynegy Comments on Data Release Phase 3 Straw Proposal

Submitted By	Company	Date
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Dynegy supports the comments submitted by the Western Power Trading Forum.

In addition, Dynegy offers these comments:

- The CAISO has proposed (at Section 7.4) to release actual aggregated intermittent resource supply data. The CAISO has indicated it will aggregate the release of forecast data by trading hub (NP15, SP15, ZP26). Dynegy assumes the CAISO also intends to aggregate the actual data by trading hub as well. However, historical intermittent resource data is aggregated by TAC area, not by trading hub, for use in certain Resource Adequacy matters. Given that trading hub aggregation is not the same as TAC area aggregation, can the CAISO release intermittent resource data aggregated by TAC area, too?
- The CAISO has proposed to provide TTC, CBM and OTC data for additional internal branch groups (Section 7.1.4). As Dynegy understands, CBM – Capacity Benefit Margin – is capacity reserved to serve load within the Transmission Provider’s service area. Does the CAISO apply CBMs to paths *within* its Balancing Authority Area? Alternatively, does the CAISO apply TRMs – Transmission Reliability Margins – to provide for reliability margins on internal paths? Dynegy appreciates that the CAISO is offering to provide information on transmission that the CAISO is reserving and not making available for market use, but requests that the CAISO clarify whether the information that will be provided is CBM or TRM information.