

Comments on Straw Proposal for Data Release and Accessibility – Phase 1: Transmission Constraints

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Dynegy appreciates the opportunity to submit these comments on the CAISO’s Straw Proposal for releasing data on transmission constraints.

Dynegy greatly appreciates the CAISO’s willingness to engage with its market participants on this issue. Dynegy also appreciates its commitment to providing more information (e.g., information on binding constraints and cause, a daily all-constraints list) to market participants.

The CAISO has developed tariff language that reflects its current transmission constraint enforcement practices. However, the CAISO and its market participants would be better served if, instead of simply committing to accurately describing the price-affecting actions the CAISO takes to address those deficiencies, the CAISO committed to investing sufficient resources to fix the network model deficiencies that currently require the CAISO to intervene in its markets.

It seems clear from Tariff section 27.5.6, item 1, that the CAISO has an “expectation” of what constitutes a reasonable amount of congestion, and adjusts the limits in its market model to drive market results towards that result. However, it is not clear where this expectation comes from.

While it seems futile to object to the authority to tinker with market results that the CAISO proposes to explicitly reserve for itself in Section 27.5.6, the CAISO must balance this authority with an equal measure of transparency. For each situation in which the CAISO seeks to manipulate network model parameters, it must commit to reporting on such manipulation, including the frequency, cause, and market effects of such manipulation. These reporting commitments should also be codified in Section 27.5.6.

Again, Dynegy appreciates the CAISO’s efforts to engage with its stakeholders on this issue and looks forward to further efforts to improve the CAISO’s markets.