Stakeholder Comments Template Subject: Payment Acceleration Proposal

This template has been created for submission of stakeholder comments on the following topics in regards to Payment Acceleration. Upon completion of this template please submit (in MS

Submitted By	Company	Date Submitted
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Word) to pacceleration@caiso.com. Submissions are requested by close of business on January 23rd, 2009.

Please submit your comments to the following questions for each topic in the spaces indicated.

1. Deployment Criteria and Implementation Schedule

During the Payment Acceleration Implementation Workshop on January 14th, 2009, alternatives were discussed in regards to the Deployment Criteria and Implementation Schedule. CAISO has published a proposal with consideration to input received during the workshop. Please provide comments on the proposal.

APX supports Payment Acceleration to be implemented on October 1, 2009 in order for CAISO to make the SAS 70 audit. APX also supports having a 2 month dry run period either April and May or May and June. A dry run will allow Market Participants to submit meter data at T+5B, receive daily and monthly statements, initial and true-up invoices. It will also allow the CAISO to address any issues and provide resolution prior to the implementation of Payment Acceleration.

2. Estimation Flag

Do you support a requirement to add a status flag to OMAR identifying Actual vs. Estimated values? This would require additional work on the MP's systems to pass the value to CAISO through a .CSV or MDEF file.

If the estimation flag functionality in OMAR was implemented, would you utilize it?

Do you support a mechanism for identifying CAISO estimated values on Settlements Statements? This would require file format changes and need potential MP system changes.

APX supports a status flag identifying estimated and actual values. This will allow the ease of determining which meter values were estimated vs. adjusted. However, APX doesn't support the idea of the CAISO submitting 0 values if the status flag isn't changed

to reflect "A". Instead the CAISO may want to consider leaving the estimated values submitted in place of the adjusted values if the status flag isn't changed to "A"

APX will utilize the status flag functionality because the CAISO made it clear that if the status flag wasn't changed to "A" when submitting adjusted values, the CAISO would input 0 values which will result in imbalance charges.

APX supports a mechanism for identifying estimated values on Settlement Statement.

3. Noon Deadline for submission of SQMD at T+5B

In order to complete processing for a T+7B settlement timeline, CAISO is requesting meter data be submitted by noon at T+5B. Do you a support a noon deadline for submission of SQMD at T+5B?

APX supports a midnight deadline at T+5B. We understand the settlement timeline will be moved to T+8B for publishing initial statements.

4. Business Use Cases

During the Payment Acceleration Implementation Workshop on January 14th, 2009, a concept of business use cases was presented as a way to engage stakeholders early in the requirements phase and reduce potential issues during the implementation phase.

Would you support participating in this activity during our next Implementation Workshop?

APX will participate in the Business Use Case process at the next CAISO Payment Acceleration Workshop.

5. Other Comments?

APX appreciates the opportunity to submit comments on the Payment Acceleration Proposal. APX supports the CAISO's efforts to accelerate the current payment cycle and urges the CAISO to conduct a thorough stakeholder implementation workshop process.