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
Nancy Le *nle@anaheim.net* *(714)765-4160*	*City of Anaheim*	*10/24/08*

Word) to pacceleration@caiso.com. Submissions are requested by close of business on October 24th, 2008.

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

1. **Bifurcation of DA/RT, Estimation & Settlement Timeline Options**
   During the Payment Acceleration Stakeholder meeting on October 16th, 2008, alternatives were discussed in regards to the Settlements timeline, estimation, and bifurcation of DA/RT settlements. The following options were discussed:

   - Option #1 - Add a Settlement calculation at T+9B (in addition to the proposed 'DA only' calculation at T+2B). This would provide a settlement run for RT charges prior to the proposed T+50B timeline, as well as allow for a DA/RT bifurcation at T+2B. The T+9B calculation would use one of the following estimation options absent polled or SC submitted data availability:
     - DA IFM Schedules Only
     - DA IFM + adjustment based on CAISO Actual Load
     - Current Credit Liability Meter Data estimation (uses the IFM DA schedule and adder of + /- 10% factor (or other % Factor).

     In addition, T+9B would replace the T+7B credit run.

   - Option #2 - Replace the proposed T+2B DA Only Settlement calculation with a T+5B calculation that includes both DA and RT charge codes. The T+5B calculation would use an estimation methodology based upon hourly load forecast data, which is used for all real-time load settlement calculations prior to receiving actual meter data. In addition, T+5B would replace the T+7B credit run.

	Timeline	Estimation
Option #1	T+2B – DA Only T+9B – DA &RT T+50B – 1st true-up T+100B – 2nd true-up	One of three proposed options (i.e. DA IFM schedules)

	T+18M - 3rd true-up T+35M - 4th true-up	
Option #2	T+5B – DA &RT T+50B – 1st true-up T+100B – 2nd true-up T+18M - 3rd true-up T+35M - 4th true-up	DA schedules + hourly load forecast data

Please provide comments on these options:

(Submit Comments Here)

Given the two options, Anaheim preference is Option #2.

2. **Methodology for Estimating Meter Data**
SCE has suggested the CAISO to seek additional alternatives to the three estimation options presented on September 18th. In particular, SCE recommends the CAISO to investigate the meter estimation methodology used by the New York ISO. It is their understanding that the NYISO methodology is based upon hourly load forecast data which is used for all real-time load settlement calculations prior to receiving actual meter data. NYISO has been using this methodology since its market inception in 1999 and may provide the CAISO with a fair and viable alternative to the estimation approaches currently being proposed.

CAISO is exploring this option. Would you support an estimation methodology based on hourly load forecasts?

(Submit Comments/Pros/Cons Here)

The methodology for meter estimation used by NYISO could possibly work. We would need time to investigate further and conduct a cost analysis to determine the impact.

3. **Implementation Schedule**
Do you a support the phased implementation approach discussed in the October 16th Stakeholder Meeting? Assuming invoicing remains the same as the MRTU implementation (monthly at month-end), could you support an accelerated timeline within 1-3 months post MRTU go-live? .

(Submit Comments Here)

Anaheim does not support the phased implementation approach or bifurcation in general and it does not support an accelerated timeline within 1-3 months of post go-live because of the time needed for disputes under the new system. Anaheim is comfortable with the SaMC schedule to start payment acceleration six months after "go live."

4. **Invoicing**

Would you support an invoice solution that meets the following criteria?

- Does not mix initial and true-up statements from previous accounting months
- Includes trade dates from a specific month only, but not necessarily includes trade dates that encompass a full month (i.e. could include a partial month).
- Monthly charges are on invoice that included the month end date.

Please provide detailed examples of your preferred invoicing solution.

Anaheim's preferred invoicing solution would be for twice a month billing (initial and true-up invoices) that encompass a full calendar month at month end as done in production today (prelim and final invoices) and does not include the mixing of initial/true-up statements across different accounting periods. Both the initial and true-up invoices should include both DA and RT settlements for all trade dates in a given month.

5. **Other Comments?**

(Submit Comments Here)