

# Stakeholder Comments Template

## Subject: Payment Acceleration Proposal

Submitted by	Company	Date Submitted
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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 Word) to [pacceleration@caiso.com](mailto:pacceleration@caiso.com). Submissions are requested by close of business on October 2nd, 2008.

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

### 1. Bifurcation of DA/RT Settlements

During the Payment Acceleration Stakeholder meeting on August 19<sup>th</sup>, 2008, Calpine presented a proposal to bifurcate the DA/RT settlements (proposal was posted for MP review on 8/20/08). CAISO is conducting an impact analysis on this proposal and to date has concluded the following:

- No legal or policy issues exist that would prevent a DA/RT market settlement bifurcation.
- System and process impacts exist, however; CAISO feels they are manageable.
- Due to system/process impacts, implementation would occur post MRTU go-live.
- Complexity of Meter Estimation is eliminated.

Please provide comments on any impacts this proposal would have on your systems and/or processes.

**Separate settlements of DA and RT seems like such a logical and straightforward solution, why go to the trouble of developing additional complexity? Since the bulk of the day's energy will be in DA, if that can be settled quickly, it alleviates most of the credit difficulty. This is especially true for legacy contracts (State's long term power contracts.)**

### 2. Methodology for Estimating Meter Data

CAISO held a conference call on September 18<sup>th</sup>, 2008 to discuss potential methodologies for estimating Meter Data at T+5B absent polled or SC submitted data availability. Options discussed are listed below:

- Using DA IFM Schedules Only
- Using DA IFM + adjustment based on CAISO Actual Load
- Use current Credit Liability Meter Data estimation (uses the IFM DA schedule and adder of +/- 10% factor (or other % Factor).

(Submit Comments/Pros/Cons Here)

**3. Guidelines for SC submitted T+5B Meter Data**

- “measurement file” guideline vs. SQMD requirement
- Determining accuracy for SC submitted “measurement file” or SQMD
- Responsibilities for compliance for SC submitted “measurement file” or SQMD

(Submit Comments/Pros/Cons Here)

**4. In cases where Meter Data estimation is used, do you support applying interest charges on the variation between initial & true-up statements?**

(Submit Comments Here)

**5. Implementation Schedule**

Would you support a manual invoicing process to accelerate payments and cash clearing on an interim basis until the final Payment Acceleration solution can be implemented post MRTU go-live? The manual process would not require any SaMC external interface changes. It would be based on pre-payment of DA charge codes and be reflected on the SaMC invoice.

(Submit Comments Here)

**6. Invoicing Options**

Please comment on the following invoice preference:

- Monthly on a fixed date - i.e.) 20<sup>th</sup> of every month
- Proposed – 3<sup>rd</sup> Tuesday of each month
- Semi-Annual or Weekly

Mixing Initial & True-up Statement across Different Accounting Months on same invoice.

(Submit Comments Here)

**7. Other Comments?**

(Submit Comments Here)