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Comments of Northern California Power Agency Payment Acceleration – Submission of Wheeling Access Charge Data

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Comments

Northern California Power Agency (NCPA) provides these comments in response to the CAISO discussion paper regarding the submission of Wheeling Access Charge (WAC) settlement data within the proposed timelines of Payment Acceleration. As discussed in the paper NCPA has proposed that WAC settlement data be submitted in accordance with the Settlement Quality Meter Data submission timelines established in Section 10.3.6 of the CAISO Tariff. This change would require WAC data to be submitted to CAISO for each day of the applicable month five (5) business days after the trade date, rather than five (5) business days after the trade month. This data submission timeline will provide consistency in process for how all data is provided to CAISO under Payment Acceleration. NCPA would like to confirm that this proposed change will not result in data process and submission difficulties within NCPA, and will not create any onerous requirements on NCPA staff who will supply such data. On the contrary, NCPA believes that this change will streamline the data submission process and increase the accuracy of CAISO settlements.

CAISO clarifies in the discussion paper that if the language proposed by NCPA is not adopted the Non-PTO portion of the WAC will not be included on the initial statement at T+7B. CAISO further explains that, in such instance, WAC would first be available in the recalculation statement at T+38B and be subject to interest charges per the Payment Acceleration interest policy. NCPA believes that assessing interest to a market participant is not equitable or appropriate in a situation where the process does not enable a market participant to submit required data (WAC settlement data in this instance) to avoid the penalty of interest. Pursuant to the NCPA proposed language, a market participant will have the ability to provide the requirement WAC settlement data in accordance with the Payment Acceleration timeline, and therefore avoid any punitive interest costs. For NCPA WAC constitutes a significant portion of its overall CAISO settlement invoice. Under the current data submission timeline applied interest costs could be substantial.