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.

Payment Acceleration Entrance Criteria

- *PG&E recommends that the CAISO incorporate delivery dates for BPMs, the payment calendar and technical specifications into the Payment Acceleration Timeline. Within the dry run period, PG&E also would like to see specific dates for the business use cases and the corresponding statements and invoices.*

- *PG&E wants a better understanding of how CAISO specifically will compress the processing of monthly cycles to include T+76B invoices within the dry run and what expectations CAISO has for September after the dry run period concludes at the end of August.*

- *PG&E would like to know if the CAISO intends to maintain separate files for meter data submitted by the MP at T+5B, T+43C and T+48B?*

- *PG&E would like a better understanding of exactly how the CAISO will administer and accept changes between meter data submitted at T+5B and T+43C? For example, will there be same day acknowledgement that T+43C data has been accepted and validated by the CAISO or will a T+43C file fail validation because T+5B data has posted previously for the same trade date? For business purposes, PG&E prefers to receive*

same day acknowledgment from the CAISO for files posted on T+5B and T+43C. We assume any data re-submittals done after T+43C which require manual intervention will remain unchanged from current practice.

Production Stability

- *Given that there are no parameters around the definition of "accuracy" during this testing, PG&E proposes that testing non-acceptability should constitute at a minimum: (1) any significant error in a statement or invoice which is prolonged and not corrected subsequently and/or (2) a prolonged departure from publishing statements and invoices in a timely manner.*

Implementation Timeline

- *PG&E supports a Payment Acceleration go-live date of October 1, 2009 at the earliest. This start date theoretically addresses the concern of having sufficient time for both: (1) a 2 month production testing period after the start of MRTU and (2) a "dry run" period of Payment Acceleration testing. October 1 also leaves additional time to implement any lessons learned from post MRTU go-live invoices to 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.

- *PG&E supports the use of a status flag in OMAR identifying actual and estimated meter values. This flag should also distinguish further between estimates provided by CAISO or by the MP. PG&E would like CAISO to develop and distribute the specifications for the estimation flag as soon as possible so that we can begin to build it into our processes.*

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?

- *At the present time, PG&E would prefer to keep the posting deadline at midnight on T+5B to maintain consistency with current business practices. This deadline would ensure that we would have adequate time to resolve any systems issues.*

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?

- *PG&E would like to participate in the development of business use cases as an activity during the next Implementation Workshop, but would also like an indication from the CAISO as to the time commitment involved beyond that.*

5. Other Comments?

- *PG&E understands that there will not be any conditions or events whatsoever post-Payment Acceleration go-live under which the CAISO would issue a revised statement or invoice between T+76B and T+18M. Is our understanding correct?*

- *In the dry run period for Payment Acceleration, will the CAISO test specifically for a T+18M or T+35M invoice?*