

# Powerex Comments

## Subject: Draft Payment Acceleration Tariff Language

Submitted by	Company	Date Submitted
<i>Gifford Jung</i> <i>604-891-6040</i>	<i>Powerex Corp.</i>	<i>May 15, 2009</i>

Powerex appreciates the CAISO providing this opportunity to comments on the Draft Payment Acceleration Tariff Language.

Powerex supports and appreciates the CAISO's continuing efforts on implementing Payment Acceleration at the earliest possible date.

Powerex is in general agreement with the proposed draft tariff language especially with the reduction in Unsecured Credit Limit to \$50 million. Powerex believes that this reduction in credit exposure is appropriate with the implementation of Payment Acceleration.

However, Powerex has a concern that the proposed tariff language does not specify when the CAISO would be required to respond to disputes. Powerex requests that the CAISO clarify by adding the following language to section 11.29.8.4.1 (and modified as appropriate for sections 11.29.8.4.2, 11.29.8.4.3, 11.29.8.4.4, and 11.29.8.4.5): "The CAISO will make a determination on the dispute and respond to the Scheduling Coordinator no later than the next Recalculation Settlement Statement for that Trade Date."

### **11.29.8.4.1 Dispute of Initial Settlement Statement T+7B**

Each Scheduling Coordinator, CRR Holder, Black Start Generator or Participating TO may submit a dispute that identifies discrepancies or errors for any item in an Initial Settlement Statement T+7B, except for items that depend on Estimated Settlement Quality Meter Data, no later than fourteen (14) Business Days from the publication date of an Initial Settlement Statement T+7B. The CAISO will make a determination on the dispute and respond to the Scheduling Coordinator no later than the next Recalculation Settlement Statement for that Trade Date. Valid disputes regarding data appearing on an Initial Settlement Statement T+7B will be reflected in a later Recalculation Settlement Statement for that Trade Date. If a Scheduling Coordinator, CRR Holder, Black Start Generator or Participating TO disagrees with the CAISO's resolution of a

dispute regarding data appearing on an Initial Settlement Statement T+7B, it may initiate a good faith negotiation of the dispute with the CAISO no later than thirty (30) days after the date of the CAISO's response to the dispute.

In addition, Powerex believes that Section 11.29.8.3 includes an incorrect reference to "Sections 11.29.8.3.1 through 11.29.8.3.6" and that the correct reference appears to be "Sections 11.29.8.4.1 through 11.29.8.4.6".

Thank you for the opportunity to provide comments.