

Discussion

During the Payment Acceleration Tariff comment period, NCPA raised a suggestion to improve the efficiency of the proposed Payment Acceleration changes.

Section 26.1.4.4 (Information Required from Scheduling Coordinators) of the CAISO Tariff describes the process for supplying information to the CAISO to bill for Wheeling Access Charges. According to this section, Scheduling Coordinators for Wheeling Out or Wheel Through transactions to a Bulk Supply Point, or other point of interconnection between the CAISO Controlled Grid and the transmission system of a Non-Participating TO, that are located within the CAISO Balancing Authority Area, shall provide the CAISO, **within five (5) days from the end of the calendar month to which the relevant Trading Day relates**, details of such transactions (other than transactions submitted as Self-Schedules pursuant to Existing Contracts) sorted by Bulk Supply Point or point of interconnection for each Settlement Period (including KWh for each transaction). This information submittal includes data for each day of the applicable month, but such information is submitted to the CAISO only once a month on the fifth day following the trade month. NCPA feels this monthly submission may now be inconsistent with the daily meter data submission process proposed in the Payment Acceleration process. In the current process, SCs provide CAISO with information for the entire month five days after the trade month, rather than submitting information on a daily basis. As a result it is more difficult to fine tune the accuracy of the data in such a short validation time period. NCPA suggests instead that Scheduling Coordinators of such transactions should submit daily data for the assessment of Wheeling Access Charges on the same schedule as the rest of the payment acceleration meter data submittal process – by T+5B (Noon). This should improve the accuracy of the data being provided and will provide process consistency.

Proposal

NCPA proposes language in Section 26.1.4.4 to link this data submission process to the payment acceleration meter data submission timeline:

26.1.4.4 – Scheduling Coordinators for Wheeling Out or Wheeling Through transactions to a Bulk Supply Point, or other point of interconnection between the CAISO Control Grid and the transmission system of a Non-Participating TO, that are located within the CAISO Balancing Authority Area, shall provide the CAISO, details of such transactions (other than transactions submitted as Self-Schedules pursuant to Existing Contracts) sorted by Bulk Supply Point or point of interconnection for each Settlement Period (including kWh for each transaction) **in accordance with the Settlement Quality Meter Data submission timelines established in Section 10.3.6. A Scheduling Coordinator for a Non-**

Participating TO MSS Operator will provide to the CAISO its applicable net metered CAISO Demand. The CAISO shall use such information, which may be subject to review by the CAISO, to settle Wheeling Access Charges and payments. The CAISO shall publish a list of the Bulk Supply Points or interconnection points to which this Section 26.1.4.4 applies together with details of the electronic form and procedure to be used by Scheduling Coordinators to submit the required information on the CAISO Website.

Impact

Language proposed by NCPA would require process timeline changes for the submittal of non-PTO load data. This process timeline would affect only those participants providing data for each day of the applicable month to the CAISO once a month on the fifth day following the trade month.

The new data submittal timeline proposed would require this data to be **submitted for each day of the applicable month to the CAISO 5 business days after the trade date.**

Failure to submit the data within the Payment Acceleration timelines would result in the application of charges to the Non-PTO load as part of the initial settlement statement T+7B calculation. These charges would be subsequently reversed and interest applied to any overpayment made by the SC, submitting Non-PTO load, in the recalculation settlement statement T+38B calculation.

Conversely, the Participating TOs would receive payment for any wheeling revenues associated with unsubmitted Non-PTO load as part of the initial settlement statement T+7B calculation. These credits would be subsequently reversed and interest applied to any overpayment received by the Participating TOs in the recalculation settlement statement T+38B calculation.

If proposed language is not adopted, Non-PTO portion of the Wheeling charges will not be included on the initial statement at T+7B. These charges would first be available in the recalculation statement at T+38B and be subject to interest charges per the Payment Acceleration interest policy.

Stakeholder Feedback Requested

As part of the ongoing efforts for Stakeholder engagement on the Payment Acceleration Project, the CAISO is requesting feedback from identified impacted stakeholders on capability to make adjustments to their current Process Timelines for submittal of Non-PTO load information in order to accommodate the current settlement of applicable Non-PTO load Wheeling Access charges and payments on the Initial Settlement Statement T+7B calculation.



Feedback is also requested by the stakeholder on Settlement Impact concerns if Payment Acceleration process timelines are unable to be met.

Next Steps

The CAISO Payment Acceleration Project team will be scheduling conference calls with identified impacted Stakeholders of this issue within the month. Stakeholder feedback will be obtained during these conference calls in order for the CAISO to make decisions on the suggested changes presented by NCPA. This decision will then be communicated to all participants. Any comments can be submitted to the Payment Acceleration mailbox at pacceleration@caiso.com.