Attachment A

Stakeholder Process: Payment Acceleration

Summary of Submitted Comments

Stakeholders submitted rounds of written comments to the ISO on the following dates:

- Round One, 10/2/2008
- Round Two, 10/14/2008
- Round Three, 10/24/2008
- Round Four, 11/13/2008
- Round Five, 12/2/2008

Stakeholder comments are posted at: http://www.caiso.com/docs/2005/03/23/2005032307323521863.html

Other stakeholder efforts include:

- Conference calls
 - o 9/18/2008
 - o 11/06/2008
 - o 12/04/2008
- In-person meetings
 - o 8/19/2008
 - o 10/16/2008
 - o 11/17/2008
- Other stakeholder efforts
 - Initial in-person/conference meetings with 14 stakeholders in July/August timeframe to collect feedback on initial whitepaper published May 30th, 2008.

Management Proposal	ACES	Anaheim	APX	San Diego Gas & Electric	SCE	Powerex
Accelerate Settlement	Support	Support	Support	Support	Support	Support
Timeline to the following:						
TD + 7B	Supports timeline	Supports timeline	Supports timeline	Preferred a T+51B second	Preferred a T+51B	Supports timeline
TD + 38B	proposed by the	proposed by the	proposed by the CAISO.	true-up, but after	second true-up, but	proposed by the
TD + 76B	CAISO. Meets	CAISO. Meets	Meets objective of	conference call will support	after SH meeting will	CAISO. Meets
TD + 18M	objective of	objective of	Payment Acceleration.	timeline proposed by the	support timeline	objective of Payment
TD + 35M	Payment	Payment		CAISO. Meets objective of	proposed by the	Acceleration.
TD = Trade Date B = Business Days	Acceleration.	Acceleration.		Payment Acceleration.	CAISO.	
Meter Data Substitution	Support	Support	Support	Support	Conditional	Support
Require submittal of	Support	Support	Support	Support	Conditional	Support
estimated Settlement	Supports	Supports	Supports methodology	After conference call,	Supports proposal to	Supports methodology
Quality Meter Data five	methodology	methodology	proposed by the CAISO	supports methodology	require SCs to submit	proposed by the CAISO
business days after the	proposed by the	proposed by the	for Meter Data	proposed by the CAISO for	estimated meter data.	for Meter Data
relevant trading day.	CAISO for Meter	CAISO for Meter	Substitution at T+5B.	Meter Data Substitution at	estimated meter data.	Substitution at T+5B.
When meter data is not	Data Substitution	Data Substitution at	Substitution at 1+5D.	T+5B.	Would prefer historical	Substitution at 1+5D.
available within this	at T+5B.	T+5B.		1+50.	actual consumptions be	
timeframe, the CAISO will	at 1+5D.	1+50.			used instead of	
estimate outstanding					estimations when SC	
metered demand and					does not submit data.	
generation.					does not submit data.	
Interest Payments	Conditional	Support	Support	Oppose	Support	No Comment
Apply interest to any	Conditional	Support	Support	oppose	Support	
deviations through the	Assessed only on	Supports interest,	Supports interest	No current precedent and	Supports interest,	
second true-up invoice.	Uninstructed	would like to see it	provision proposed by	not clear if additional	would like to see it	
This is to help ensure that	Deviation amounts	extended through all	the CAISO.	incentive is needed or will	extended through all	
no financial incentives	that change	true-ups.		work as intended.	true-ups. Feels an	
exist to submit	between the Initial	a de apor			interest provision is a	
unreasonable meter data.	and each				must & will not support	
unicusonable meter data.	subsequent invoice.				PA without one.	
	succequent in cree					
Invoicing	Support	Support	Support	Support	Support	Support
Accelerate initial invoicing	Supports proposed	Supports proposed	Supports proposed	Supports proposed	Supports proposed	As an interim step to
to semi-monthly.	invoicing calendar	invoicing calendar	invoicing calendar	invoicing calendar	invoicing calendar	weekly invoicing.
Sunset Provision	Support	Support	Support	Support	Support	Support
Implement a sunset	Supports sunset	Supports sunset	Supports sunset	Support Support Supports sunset provision at	Supports sunset	Supports sunset
provision policy at T+36M.	provision at	provision at T+36M.	provision at T+36M.	T+36M.	provision at T+36M.	provision at T+36M.
provision poncy at 1+30141.	T+36M.			1+J01VI.		
Deployment Schedule	Support	Support	Oppose	Oppose	Oppose	Support
Deploy 3-5 months post	Supports CAISO	Supports CAISO	At least 6 months after	At least 6 months after	Dependant on	Would prefer with
MRTU go-live based on	proposal.	proposal.	MRTU go-live based on	MRTU go-live based on	publishing three	MRTU go-live, but ok
pre-determined criteria			MRTU stability.	MRTU stability.	months of accurate	with proposed schedule.
					settlement statements.	

Management Proposal	Pasadena	PG&E	Calpine	JP Morgan	WPTF	Mirant
Accelerate Settlement	Support	Conditional	Support	Support	Support	Support
Timeline to the following:	••					
TD + 7B	Supports timeline	Supports timeline	Supports timeline	Supports timeline proposed	Supports timeline	Supports timeline
TD + 38B	proposed by the	proposed by the	proposed by the	by the CAISO. Meets	proposed by the	proposed by the
TD + 76B	CAISO. Meets	CAISO. Would like	CAISO. Meets	objective of Payment	CAISO. Meets	CAISO. Meets
TD + 18M	objective of	to see the 2 nd true-up	objective of Payment	Acceleration.	objective of Payment	objective of Payment
TD + 35M	Payment	time reduced.	Acceleration.		Acceleration.	Acceleration.
TD = Trade Date	Acceleration.					
B = Business Days						
Meter Data Substitution	Support	Support	Support	Support	Support	Support
Require submittal of						
estimated Settlement	Supports	Supports	Supports methodology	Supports methodology	Supports methodology	Supports methodology
Quality Meter Data five	methodology	methodology	proposed by the	proposed by the CAISO for	proposed by the	proposed by the
business days after the	proposed by the	proposed by the	CAISO for Meter Data	Meter Data Substitution at	CAISO for Meter Data	CAISO for Meter Data
relevant trading day.	CAISO for Meter	CAISO for Meter	Substitution at T+5B.	T+5B.	Substitution at T+5B.	Substitution at T+5B.
When meter data is not	Data Substitution	Data Substitution at				
available within this	at T+5B.	T+5B.				
timeframe, the CAISO will						
estimate outstanding						
metered demand and						
generation.						
Interest Payments	No Comment	Support	Oppose	Oppose	Oppose	Oppose
Apply interest to any						
deviations through the		Supports interest,	Not necessary.	Concerned may complicate	Motivations and	Not at this time, should
second true-up invoice.		would like to see		and/or delay	likelihood of	re-evaluate at a later
This is to help ensure that		consideration given		implementation due to it	manipulation are	date after time under
no financial incentives		to a dollar threshold		being a contentious policy	remote, should re-	the new PA framework.
exist to submit		after the second true-		issue with FERC. Supports	evaluate at a later date.	
unreasonable meter data.		up period.		revisiting at a later time.		
Invoicing	Support	Support	Support	Support	Support	No Comment
Accelerate initial invoicing	Supports proposed	Supports proposed	Supports proposed	Supports proposed	Supports proposed	
to semi-monthly.	invoicing calendar	invoicing calendar	invoicing calendar	invoicing calendar	invoicing calendar	
Sunset Provision	Support	Support	Support	Support	Support	Support
Implement a sunset	TT	TT	II.	x x	TT .	T.T.
provision policy at T+36M.	Supports sunset	Supports sunset	Supports sunset	Supports sunset provision at	Supports sunset	Supports sunset
F	provision at	provision at T+36M.	provision at T+36M.	T+36M.	provision at T+36M.	provision at T+36M.
	T+36M.	F	r		F	P
Deployment Schedule	No Comment	Oppose	Support	Support	Support	Support
Deploy 3-5 months post		At least 6 months	Would prefer with	Would prefer with or 'soon	Would prefer 3 months	Would prefer with
MRTU go-live based on		after MRTU go-live	MRTU go-live, but ok	after' MRTU go-live.	at a maximum.	MRTU go-live, but ok
pre-determined criteria		based on MRTU	with proposed	Critical for reducing market		with proposed
r		stability.	schedule.	risk and providing stability.		schedule.

Management Proposal	WAPA	NCPA	CDWR	Dynergy	MID	Six Cities
Accelerate Settlement	Support	Support	Support	Support	Support	Conditional
Timeline to the following:						
TD + 7B	Supports timeline	Supports timeline	Supports timeline	Supports timeline proposed	Supports timeline	Prefers second true-up
TD + 38B	proposed by the	proposed by the	proposed by the	by the CAISO. Meets	proposed by the	at T+51B rather than
TD + 76B	CAISO. Meets	CAISO. Would like	CAISO. Meets	objective of Payment	CAISO. Meets	T+76B.
TD + 18M	objective of	to have compliance	objective of Payment	Acceleration.	objective of Payment	
TD + 35M	Payment	related charge codes	Acceleration.		Acceleration.	
TD = Trade Date	Acceleration.	eliminated from				
B = Business Days		Initial Settlements.				
Meter Data Substitution	Support	Support	Support	Support	Support	Support
Require submittal of						
estimated Settlement	Supports	Supports	Supports methodology	Supports methodology	Supports methodology	Supports methodology
Quality Meter Data five	methodology	methodology	proposed by the CAISO	proposed by the CAISO for	proposed by the CAISO	proposed by the CAISO
business days after the	proposed by the	proposed by the	for Meter Data	Meter Data Substitution at	for Meter Data	for Meter Data
relevant trading day.	CAISO for Meter	CAISO for Meter	Substitution at T+5B.	T+5B.	Substitution at T+5B.	Substitution at T+5B.
When meter data is not	Data Substitution	Data Substitution at				
available within this	at T+5B.	T+5B.				
timeframe, the CAISO will						
estimate outstanding						
metered demand and						
generation.						
Interest Payments	Support	Oppose	No Comment	Oppose	Oppose	Support
Apply interest to any						
deviations through the	Supports interest	Appropriate		No reason provided.	Unnecessary	Supports interest
second true-up invoice.	provision proposed	compliance			complication that does	provision proposed by
This is to help ensure that	by the CAISO.	measurements &			not need to be	the CAISO.
no financial incentives		enforcement should			introduced in the near	
exist to submit		be used to discourage			term.	
unreasonable meter data.		unreasonable				
		scheduling practices				
Invoicing	Support	Support	Support	No Comment	No Comment	Conditional
Accelerate initial invoicing	Supports proposed	Supports proposed	Supports proposed			Remove multiple
to semi-monthly.	invoicing calendar	invoicing calendar	invoicing calendar			months on single
						Invoice.
Sunset Provision	Support	Support	Support	Support	Support	Support
Implement a sunset						Supports sunset
provision policy at T+36M.	Supports sunset	Supports sunset	Supports sunset	Supports sunset provision at	Supports sunset	provision at T+36M.
	provision at	provision at T+36M.	provision at T+36M.	T+36M.	provision at T+36M.	
	T+36M.					
Deployment Schedule	Oppose	Oppose	Oppose	No Comment	No Comment	Support
Deploy 3-5 months post	At least 6 months	At least 6 months after	At least 6 months after			
MRTU go-live based on	after MRTU go-live	MRTU go-live based	MRTU go-live based on			
pre-determined criteria	based on MRTU	on MRTU stability.	MRTU stability.			
	stability.		1	1	1	

Management Proposal	Management Response
Accelerate Settlement Timeline to the	
following:	Full Stakeholder Support on proposal to accelerate settlement timeline.
TD + 7B	Some participants prefer moving the second true-up to T+51B, however;
TD + 38B	that timeline would not allow for a sufficient dispute resolution window.
TD + 76B	
TD + 18M	
TD + 35M	
TD = Trade Date	
B = Business Days	
Meter Data Substitution	
Require submittal of estimated Settlement Quality	Full Stakeholder Support on Meter Data Substitution methodology.
Meter Data five business days after the relevant	
trading day. When meter data is not available	
within this timeframe, the CAISO will estimate	
outstanding metered demand and generation.	
Interest Payments	The CAISO is proposing that initially, interest stop after the second true-up
Apply interest to any deviations through the	Invoice and not carry on into subsequent Invoices that could occur for the
second true-up invoice. This is to help ensure that	T + 18 month and $T + 35$ month Settlement Statements. Since the target
no financial incentives exist to submit	implementation for payment acceleration is sometime between three and five
unreasonable meter data.	months after MRTU start-up, the CAISO will have time to evaluate prior to the
	first T + 18 month Statement whether or not interest charges are necessary
	beyond the second true-up Invoice by evaluating Settlements and Market Data.
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Invoicing	Full Stakeholder Support on proposal to invoice semi-monthly. Some
Accelerate initial invoicing to semi-monthly.	participants prefer not to combine billing periods on an Invoice. However, that practice is an approved MRTU design and will be the standard post
	MRTU go-live.
Sunset Provision	Full Stakeholder Support on proposal to implement sunset provision at 36
Implement a sunset provision policy at T+36M.	months.
Deployment Schedule	Payment Acceleration will not be implemented until after MRTU go-live. A
Deploy 3-5 months post MRTU go-live based on	deployment criteria has been established to help determine readiness.
pre-determined criteria	
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