

# **California Department of Water Resources State Water Project Comment on California Independent System Operator Payment Acceleration Stakeholder Process**

**Submitted May 15, 2009**

California Department of Water Resources State Water Project (CDWR-SWP) appreciates the opportunity to comment to California Independent System Operator (CAISO) on this matter. Briefly,

**Section 11.29.7.1.1 Initial Settlement Statement T+7B** contains inaccurate references to a section that has been deleted and or modified.

(c) the components of each charge in each Settlement Period except for information contained in the Imbalance Energy report referred to in this Section 11.29.7.1.1; and

(d) 11.29.7.1.1.1. ~~Each Initial Settlement Statement shall also be accompanied by a breakdown of the components of the Imbalance Energy Charge (the Imbalance Energy report).~~

In **Section 11.29.8.2 Validation of Initial Settlement Statement** the use of Initial Settlement Statement T+7B should be used uniformly through out, the last paragraph is missing the letter "B" for business days following "T+7".

Section **11.29.8.3 Validation of Recalculation Settlement Statements** should reference Sections 11.29.8.4.1 (etc.) instead of "Sections 11.29.8.3.1 through 11.29.8.3.6" in the last paragraph.

**Section 11.29.10 Billing and Payment** should read as follows,

"Each Invoice or Payment Advice will show amounts which are to be paid by or to each Scheduling Coordinator, CRR Holder, Black Start Generator or Participating TO, the Payment Date, being the date on which such amounts are to be paid or received, and details of the CAISO Clearing Account to which any amounts owed by or to Scheduling Coordinators, CRR Holder, Black Start Generator or Participating TO are to be paid."

With the underlined text added.

In **Section 11.29.10.5 Use of Estimated Data** the following change should be made,

“In the event of an emergency or a failure of any of the CAISO software or business systems, the CAISO may use estimated Settlement Statements and Invoices and Payment Advices and may implement any temporary variation of the timing requirements relating to the Settlement and billing process contained in the CAISO Tariff as long as the timing requirements are not shorter or more “stringent”. Details of the variation and the method chosen to produce estimated data, Settlement Statements and Invoices and Payment Advices will be published on the CAISO Website.”

With the underlined text added.

**In Section 37.5.2.1 Expected Conduct,**

“Failure to provide complete and accurate Settlement Quality Meter Data (actual and SC estimated), as required by Section 10 and that results in an error that is discovered after issuance of a Initial Settlement Statement T+7B ~~Reissue or~~ Recalculation Settlement Statements, as relevant, shall be a violation of this rule.”

With the underlined text added, “or” should not have been struck through.