

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.

The Cities have two objections to the proposed deployment criteria and implementation schedule.

First, a demonstration of reasonable accuracy of initial MRTU settlements should be a principal criterion for deployment of Payment Acceleration. If there are or appear to be non-trivial problems with the accuracy of MRTU settlements, deployment of the Payment Acceleration process should be postponed until such problems are resolved. Accelerating payments while there are unresolved problems with accuracy of settlements will increase the risk of significant market disruptions associated with settlements issues.

Second, the Cities oppose the overlapping of the Payment Acceleration Dry Run period with the period during which invoices for the initial two months of MRTU production will be issued (assuming an April 1, 2009 implementation date for MRTU). Overlapping the Dry Run period for Payment Acceleration with the period during which initial MRTU invoices are expected to be issued raises at least two concerns. First, if there are problems with accuracy of the MRTU invoices, the Dry Run results for Payment Acceleration will be distorted. Second, conducting the Payment Acceleration Dry Run during the same time period when initial invoices under MRTU are issued will strain the resources of many Market Participants (particularly if both activities occur during the summer months) and potentially limit participation in the Payment Acceleration Dry Run. Although the Cities generally support implementation of Payment Acceleration, conducting the Dry Run during September

through November of 2009, with a target implementation date of January 1, 2010, is appropriate in light of the concerns identified above.

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.

No comments.

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 support a noon deadline for submission of SQMD at T+5B?

No comments.

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?

No comments.

5. Other Comments?

No other comments.