

Stakeholder Comments Template
Subject: Payment Acceleration Proposal

Submitted by: Constellation

Contact Persons:

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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.

Comments: Constellation supports the implementation of the accelerated payment schedule proposed by the CAISO at the January 14, 2009 meeting. However, the proposal requires LSEs, such as Constellation (who is a registered Electric Service Provider) to submit meter data at T+5.

Constellation is concerned that, in some instances, it will not have meter information in that time frame. At the January 14 meeting, it was acknowledged that there needs to be further refinement of tariff provisions and specific detailed business practices associated with the Estimated SQMD meter data requirements associated with the implementation of the accelerated payment proposal. Constellation will participate in that process to ensure that the meter data issues are fully addressed.

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.

Comments: Constellation believes that the flag to identify Actual vs. Estimated values would be useful. Constellation has not identified any system changes that would be necessary if the flag functionality is implemented.

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?

Comments: As noted in the response to Question #1 above, Constellation remains concerned about the ability to submit meter data at T+5, and looks forward to the ongoing effort to address and resolve the necessary tariff refinements and business practices associated with the meter data requirements. Constellation expects that as those issues are resolved, a determination can be made as to whether a noon deadline is feasible.

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?

Comments: Constellation would be pleased to participate in the business use cases at the next implementation workshop.

5. Other Comments?

Comments: None.