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Comments of Northern California Power Agency Wheeling Data Submission Tariff Amendment Initiative Draft Tariff Language

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Comments

Northern California Power Agency (NCPA) provides these comments in response to CAISO's proposed revision to Section 26.1.4.4 of the CAISO Tariff regarding the process used for submission of Wheeling Out and Wheeling Through transaction data. NCPA does not oppose the changes proposed by CAISO, but requests that additional language be added to Section 26.1.4.4 to clarify how such data will be incorporated into the settlement process, and upon what deadline can revised settlement quality meter data can be submitted to CAISO.

The CAISO is proposing to set the deadline for submitting Wheeling Out and Wheeling Through transaction data at T+43 calendar days from the Trade Day. This transaction data will then be used in the Recalculation Settlement Statement T+38B calculation. NCPA does not object to this change. NCPA requests that additional language be added to section 26.1.4.4 the clarify that Wheeling Out and Wheeling Through transaction data that is submitted by a Scheduling Coordinator to CAISO within five (5) business days of the Trading Day, even though not officially due until T+43 calendar days, will be incorporated into the initial settlement statement at T+7 business days rather than being held for settlement in the Recalculation Settlement Statement at T+38B. With implementation of payment acceleration, interest in now assessed against changes between initial and recalculated invoice amounts, and for NCPA Wheeling Access Charges make up a significant portion of its invoice, so withholding Wheeling Out and Wheeling Through transaction data, regardless if such data is submitted prior to the T+43C deadline, for use in the Recalculation Settlement Statement at T+38B would result in unjust and significant interest charges to NCPA. In practice today, if Wheeling Out and Wheeling Through transaction data is submitted to CAISO within five (5) business days of the Trading Day such data is included and invoiced in the initial settlement statement at T+7B. The current language, as drafted by CAISO, does not sufficiently clarify this practice, and NCPA believes that it would be beneficial to add such detail to the proposed language.

Also, Section 26.1.4.4 does not confer a Scheduling Coordinators ability to submit revised settlement quality meter data after the T+43C deadline as provided in CAISO Tariff Section 10.3.6.3. NCPA suggests that CAISO add language to Section 26.1.4.4 to clarify that revised Wheeling Out and Wheeling Through transaction data may be submitted to CAISO after T+43C in accordance with Section 10.3.6.3 of the CAISO Tariff.