

CAISO Payment Acceleration Workshop

1-14-09

Comments from Pacific Gas & Electric Co

PG&E would like to propose that the discussion of Payment Acceleration be divided into 2 separate sections: (1) testing criteria that need to happen in order to validate the successful introduction of MRTU and (2) testing criteria that need to happen concurrently with (1) in order to validate the system readiness for Payment Acceleration. The following discussion and attached timelines assume that MRTU Go-Live begins April 1, 2009.

MRTU Exit Criteria:

1. After MRTU Go-live date commences April 1 (see attached timeline), CAISO must issue 3 consecutive monthly cycles (April, May and June) of Initial and Recalc daily statements and invoices at T+38B and T+51B, respectively.
2. Statements and invoices must be accurate and distributed on time.

Payment Acceleration Entrance Criteria:

3. A two month (June and July) invoicing cycle, or “dry run period”, for Payment Acceleration through T+76B invoices must begin concurrently with #1. The timeline example, assuming 2 months of successful testing, estimates that Payment Acceleration could begin no earlier than Dec 1st, 2009. Any sooner than this presents a burden on the PG&E workforce which is devoted currently to MRTU testing and implementation.
4. For the two months of dry run testing, CAISO must accurately generate and distribute on time: (1) daily and monthly statements and (2) corresponding invoices for each scheduling coordinator.
5. PG&E estimates five months of development time for a meter estimating system to submit T+5B meter data, including the unit and integration testing time required prior to testing against live MRTU-generated invoices. This development timeline has PG&E ready to conduct live testing on June 1, 2009 at the start of the dry run period.