

Stakeholder Comments Template

Subject: Payment Acceleration Straw 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 Thursday, November 13th, 2008.

Please submit your comments to the following questions for each topic in the spaces indicated.

1. Settlement Timeline

Which of the following two options do you prefer for publication of Settlement statements?

	Timeline
Option #1	T+7B - Initial T+38B - 1 st true-up T+76B - 2 nd true-up T+18M - 3 rd true-up T+35M - 4 th true-up
Option #2	T+7B - Initial T+38B - 1 st true-up T+51B - 2 nd true-up T+18M - 3 rd true-up T+35M - 4 th true-up

Please provide comments on these options:

Powerex supports Option 1 for Settlement timelines.

2. Interest Payments

Do you support CAISO's proposal of applying interest on deviations between the Initial and first true-up statements?

Powerex has no comments on this issue at this time.

Do you prefer applying interest to subsequent true-ups?

Powerex has no comments on this issue at this time.

3. Invoicing

Please provide detailed examples of your preferred invoicing solution.

Powerex strongly supports invoicing on a weekly basis but would support a semi-monthly invoice in the interim.

Powerex also has a preference for a fixed date invoice and payment timeline.

4. Meter Data Substitution

For meter estimation process, when adjusting DA Scheduled Demand by an incremental amount to reflect Actual Load, the amount of adjustment will not exceed 15% of the DA Scheduled Demand. For example, if SC1's DA Scheduled Demand = 100 MW, the maximum estimation adjustment would be 15 MW. Therefore, SC1's Estimated Metered Demand used in the T+7B Settlement = 115MW (maximum).

Note: The proposed meter estimation methodology will never negatively adjust the DA Scheduled Demand. So in this example minimum estimation value = 100 MW, maximum estimation value = 115MW.

Powerex has no comments on this issue at this time.

5. Other Comments?

Powerex appreciates the opportunity to provide comments and commends the CAISO on acting to take this issue through its stakeholder process.

Powerex supports an early implementation of Payment Acceleration, preferably at Go-Live or soon thereafter.