

## 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
<i>Please fill in name and contact number of specific person who can respond to any questions on these comments.</i> Gloria Edwards. 916.353.4691	<i>Please fill in here</i> Western Area Power Administration	<i>Please fill in here</i> January 23, 2009

Word) to [pacceleration@caiso.com](mailto: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 14<sup>th</sup>, 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.

Western Area Power Administration Supports:

- The CAISO pre-PAP criteria, it is imperative to be able to realize a stable settlement environment for twelve Scheduling Coordinators. We have been unable to perform this function during the Market Simulation test phases, and it is uncertain if we will be able to execute end to end testing for February and March. The pre-PAP criteria provide assurance a stable settlement environment exists for both the CAISO and Western.

#### 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.

Western Area Power Administration supports the requirement to add a status flag to Omar identifying Actual to Estimated.

If the estimation flag functionality in OMAR was implemented, would you utilize it?

Yes, Western Area Power Administration would definitely utilize this mechanism

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.

Yes, Western Area Power Administration would support this mechanism, it would be perceived as an enhancement with our reconciliation and validation for our twelve Scheduling Coordinators

### 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?

Western Area Power Administration does not support the noon deadline for SQMD at T+5B. The alternative would be “mid night (PPT) for submission of SQMD at T+5B. Again, Western Area Power Administration must account for seven of our twelve Scheduling Coordinators to meet this requirement. Our meter values, will be received from various sources, consequently there are not enough resources to satisfy a noon deadline.

### 4. Business Use Cases

During the Payment Acceleration Implementation Workshop on January 14<sup>th</sup>, 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?

Western Area Power Administration supports this interest group and if this comes to fruition would be considered a committed member for this coalition.

### 5. Other Comments?

#### Interest charges and payment

- Western does not support “interest payments/charges”, consequently cannot support the ISO’s new proposals.
- Western, a Federal Agency, did not, nor cannot obtain appropriate funding to support the additional charges for these events.
- However, we concur with City of Pasadena and Constellation energy if SQMD is submitted before a Trade Date is settled and the invoice is the equivalent of the First True-up, cannot perceive need to incorporate “interest”; consequently this may alleviate our issue with appropriating funding.

Question: When differences impact load based subliminal charge codes that a Scheduling Coordinator has no control, will interest be applied for example to U.F.E.?