

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
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Word) to 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 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.

WPTF encourages further consideration of the timing and of the entrance criteria. One of the elements of the entrance criteria is that: “On-time publication of two consecutive Initial (T+38) and Recalc (T+51) invoices with the post go-live payment calendar. In addition, publication of T+38 and T+51 settlement statements corresponding to the corresponding invoice.”

WPTF notes that while the CAISO has had these exit criteria in place for some time for MRTU market simulation the CAISO has not successfully been able to accomplish the criteria. WPTF does not see the logic in going through extreme measures, or otherwise delaying a shift to accelerated payments, as a result of ongoing glitches with the non accelerated statements and invoices. In other words, if the non-accelerated statements and invoices are by design only covering the interim period between start up and the accelerated payments, it is unclear why there is a strong/solid objective of stability in the interim settlement statements and invoices rather than moving as diligently as possible into the end-state settlement statements and invoices.

WPTF instead encourages constant movement toward the end-state accelerated statements and invoices.

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.

WPTF generally favors an estimation flag if it does not delay the ability of the CAISO to implement payment acceleration on the timeline noted. WPTF is interested in further information about the cost, timing and risk impacts of adding this feature.

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?

WPTF is supportive of this mechanism if it provides for the early implementation of payment acceleration. WPTF is also open to considering other deadlines.

4. 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?

Yes, to the extent it would be helpful.

5. Other Comments?

(Submit Comments Here)