

STAKEHOLDERS' COMMENTS ON PROPOSAL TO BILL SCHEDULING COORDINATORS FOR NERC AND WECC RELIABILITY COSTS

Name and Organization	Section	Issue/Comments/Rationale	CAISO Response
Southern California Edison; State Water Project		The CAISO should bill SCs based on net energy for load -- consistent with how WECC allocated costs to the CAISO -- not based on metered Demand	The CAISO has modified its proposal to bill SCs based on net energy for load
Constellation, NewEnergy and Strategic Energy		The CAISO should not publicly post each SCs' load	The CAISO has modified its proposal so that it will only publicly post aggregate net energy for load data for the entire CAISO Control Area. The CAISO will provide each SC with its own net energy for load number that was used for billing purposes
Constellation, NewEnergy and Strategic Energy		Prospective billing causes problems for ESPs whose customer base can fluctuate from year-to-year. For the first year, the CAISO will bill for a few years and this could cause recovery issues for ESPs.	WECC has already received approval from FERC for the lag in billing, i.e., billing 2007 costs based on 2005 load, billing 2008 costs based on 2006 loads, and billing 2009 costs based on 2007 loads. The CAISO is committed to working with WECC to implement and seek approval of a more timely billing arrangement for future years. Also, the CAISO will consider whether any modifications to the billing and collection timeline are appropriate.
Southern California Edison		The CAISO should bill reliability costs by individual SC ID for entities with more than one SC ID.	The CAISO will be billing in the manner requested by SCE.