

Stakeholder Process: Settlement Process Timeline Change

Summary of Submitted Comments

Stakeholders submitted three rounds of written comments to the ISO on the following dates:

- Round One, 05/09/2011
- Round Two, 05/26/2011
- Round Three, 06/23/2011

Stakeholder comments are posted at: <http://www.caiso.com/2b6b/2b6b81c056f40.html>

Other stakeholder efforts include:

- Web conference call to discuss Issue Paper – 05/03/2011
- Web conference call to discuss the ISO's Straw Draft Proposal – 05/19/ 2011
- Web conference call to discuss the ISO's Final Draft Proposal – 06/16/ 2011

Management Proposal	SCE (IOU)	PG&E (IOU)	Calpine	Powerex	Management Response
Shortening the timing between the scheduled settlement statement publications.	Support	Support Understands ISO's position to estimate all meter data for the T+3B statement; however, should consider in the tariff update language to incorporate actual meter data in the future.	Support General support for the timeline changes; however, recommended some changes to the various deadlines.	Support	<p>The ISO considered alternatives to the various dates recommended by the market participants; however, the majority of the market participants supported the final proposal's timeline. The ISO believes this proposal supports the principles outlined in FERC Order 741.</p> <p>The ISO will be estimating all meter data required for the T+3B settlement statement and will monitor technology improvements which could support the use of actual meter data in the future.</p>
	Brookfield Support	NCPA Conditional NCPA supports timeline changes that result in shortened statement and invoicing periods.	Six Cities Support The Six Cities supported an alternative timeline.	WAPA, SNR Support	
	Pilot Power Support	WAPA, DSR Support	SDG&E (IOU) Support		

Management Proposal	SCE (IOU)	PG&E (IOU)	Calpine	Powerex	Management Response
Adding authority to process an unscheduled corrective action settlement statement.	Support Suggests an additional criteria for errors spanning multiple days but do not meet the \$1,000,000 threshold	Support	Conditional Suggest the statement be advisory.	Support Suggests additional criteria for individual SC.	The ISO does not expect to use the unscheduled corrective settlement statement process frequently. As discussed in the stakeholder process, the settlement would only be used for events with material settlement impacts to the market participants. The ISO continues to work hard to eliminate processing errors and to continuously improve the monitoring and controls of all of our system. We recognize that market participants are also working to improve their systems and we understand the impact of an unscheduled settlement statement. However, in this area, we did receive a majority of the market participants' support and therefore, believe that the addition of the tariff language will benefit the overall market.
	Brookfield	NCPA	Six Cities	WAPA, SNR	
	No Comment	Oppose NCPA supports the continuation of scheduled and predictable recalculated settlement statement.	Support Suggests additional criteria for individual SC.	Support Suggests additional criteria for individual SC.	
	Pilot Power	WAPA, DSR	SDG&E (IOU)		
	Support Suggests additional criteria for individual SC.	Support Suggests additional criteria for individual SC.	Support Suggests additional criteria for individual SC.		

Management Proposal	SCE (IOU)	PG&E (IOU)	Calpine	Powerex	Management Response
Adjusting the submittal timeline for settlement quality meter data.	Support	Support	Support	No Comment	The ISO received strong support for adjusting the submittal timeline for settlement quality meter data. The ISO believes that the changes proposed should eliminate the need for multiple resubmittals of settlement quality meter data while providing more efficient data submittals for the market participants.
	Brookfield	NCPA	Six Cities	WAPA, SNR	
	No Comment	No Comment	Support Suggests alternative submittal dates.	Support	
	Pilot Power	WAPA, DSR	SDG&E (IOU)		
	Conditional Suggested additional meter data submittal dates.	Support	Support		

Management Proposal	SCE (IOU)	PG&E (IOU)	Calpine	Powerex	Management Response
Modifying the sanction under the Rules of Conduct for Inaccurate and Timely Settlement of Settlement Quality Meter Data	Support	Support	Support	No Comment	The ISO received strong support for the changed to the Rules of Conduct sanctions for inaccurate or late actual settlement quality meter data and believes the changes will incent market participants to comply with the settlement quality meter data submittal requirements. The ISO is committed to monitor the implementation of this change as well as all Rules of Conduct requirements.
	Brookfield	NCPA	Six Cities	WAPA, SNR	
	No Comment	No Comment	Support	Support	
	Pilot Power	WAPA, DSR	SDG&E (IOU)		
	Oppose Pilot Power stated that the penalty imposed does not supports what is actually happening in the real world and puts unjust responsibility on the scheduling coordinator for something they have no control over.	Support	Support		

Management Proposal	SCE (IOU)	PG&E (IOU)	Calpine	Powerex	Management Response
Adjusting the invoicing method.	Support	Support	No comment	Support	The ISO received strong support for the alignment of the weekly invoices to have the same trade days invoiced at T+3B and later on the T+12B invoice.
	Brookfield	NCPA	Six Cities	WAPA, SNR	
	Support	Oppose	No comment	Support	
	Pilot Power	WAPA, DSR	SDG&E (IOU)		
	No comment	Support	Support		