

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
<i>Newonda Nichols</i> nnichols@apx.com 916-670-6000	APX	11/13/08

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:

[APX supports Option #2](#)

2. Interest Payments

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

Do you prefer applying interest to subsequent true-ups?

APX support applying interest on deviations between the initial and first true up statement. The goal is to have the interest serve as an incentive to the SCs to submit estimated meter data by T+5B

3. Invoicing

Please provide detailed examples of your preferred invoicing solution.

Statement Type	Statement Generated	End SC Review Period	Invoicing
Initial Statement	T+7B	T+21B	Initial – 1 st – 15 th and invoice on the 25 th day of calendar month Initial – 16 th – EOM invoice on the 10 th day of calendar month
1 st True-Up	T+38B	T+56B	Preliminary Invoices Monthly Billing EOM + 60 days
2 nd True-Up	T+76B	T+12M	Final Invoices Monthly Billing EOM + 120 days
3 rd True-Up	T+18M	T+19M	Third true up invoices monthly billing next final invoices
4 th True-Up	T+35M	N/A	Fourth true up invoices monthly billing next final invoices

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.

(Submit Comments Here)

5. Other Comments?

(Submit Comments Here)