

City of Pasadena Water & Power Stakeholder Comments

Subject: Payment Acceleration Straw Proposal

Submitted by	Company	Date Submitted
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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 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:

We prefer 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?

(Submit Comments/Pros/Cons Here)

3. Invoicing

Please provide detailed examples of your preferred invoicing solution.

This calendar provides fixed calendar date billing with flexibility for weekends and holidays, accelerated billing of initial statements, no commingled months within the calendar year.

Statement Type	Statement Generated	End SC Review Period	INVOICING	
Initial Statements	(T+7B)	T+21B	Initial Billing 1-15th trade days 25th day of calendar month	Initial Billing 16-31st trade days 10th day of calendar month
First True-Up	(T+38B)	T+56B	Preliminary Invoices Monthly Billing EOM + 60 days	
Second True-Up	(T+76B)	T+12M	Final Invoices Monthly Billing EOM + 120 days	
Third True-Up	(T+18M)	T+19M	Third True Up Invoices Monthly Billing Next Final Invoice	
Fourth True-Up	(T+35M)	N/A	Fourth True Up Invoices Monthly Billing Next Final Invoice	

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)