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 Word) to pacceleration@caiso.com. Submissions are requested by close of business on January 23rd, 2009.

Submitted by	Company	Date Submitted
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Powerex thanks the CAISO for the opportunity to provide these comments. Powerex urges the CAISO to continue to work toward the implementation of Payment Acceleration as soon as possible.

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.

While Powerex is disappointed that Payment Acceleration cannot be implemented earlier, Powerex generally supports the Deployment Criteria and Implementation Schedule.

However, Powerex notes that bi-weekly invoicing creates no new settlement issues or charge codes with its implementation so questions the need for an entrance criteria that includes "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."

Powerex believes that if no new settlement issues arise as part of the dry run for Payment Acceleration, bi-weekly invoicing and settlements should be implemented as scheduled.

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.

Powerex generally supports adding a status flag if it does not delay the timeline for implementing payment acceleration.

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 a support a noon deadline for submission of SQMD at T+5B?

Powerex supports a noon deadline but would not object to a minor relaxation that has no impact on a T+7B settlement timeline.

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?

Powerex would support this activity.

5. Other Comments?

Powerex has no other comments at this time.