

WAPA comments:

Western currently submits its Wheeling data to CAISO within five days from the end of the calendar month to which the relevant Trading Day relates. We send this information to wheeling@caiso.com and Sanda Ghirau. In addition, we send an excel summary sheet that supports our submitted meter data.

This information is our expectation of what Western should be invoiced and amazingly both files tie out. In other words, we are billed correctly based on our meter submission and spreadsheet.

With regard to NCPA's proposal, non-Participating Transmission Owners would submit their wheeling data using the new timeline T+5B (as proposed by PAP for OMAR).

We do not foresee any issues at this time with NCPA's proposal, however, we continue to operate in the Dry Run mode and have yet to see acceptable results from our internal systems and CAISO's systems.

We have yet to see how the interest calculations will fall out and would like to run more comparable analysis testing.

If you have any questions, I can be reached at 353-4467 or Sean Sanderson at 353-4466.

Liz Lynn-WAPA
Settlements