

## **Comments from OPGI**

### **A-First Settlement:**

The level of 1st settlement process information should be sufficient to provide participants with financial information with which they can make informed decisions with respect to their involvement in DAM; especially, since a large proportion of revenue stream will shift to the DAM. Information should be provided by IMO at the summary level (by resource and including all CMSC and other non-energy charges/payments).

### **B-Presentation of Details in the Payment Statements:**

It is our understanding that IMO will present, in the payment statements, separate line items of data (i.e. DAM and RT) for the smallest resolution of a given transaction amount rather than present a single composite line item. Since IMO will not know the final configuration until fall 2004; the IMO should maintain flexibility to consult participants and deal with any issues that may crop up due to a different data presentation arrangement.

### **C- NoD Deadline:**

The expected increase in volume of transactions as well as increased complexity (in particular, balancing of DAM and RT CMSCs calculations) will create a significant challenge to meet the current NoD deadlines. 4 business days after the preliminary statement is issued will likely not be adequate to submit NoDs; or, it could result in extra NoDs being filed with insufficient information that would likely lead to inefficient management of the NoDs. The deadline for NoDs needs to be extended as much as possible. An invoice based on fewer Final statements is preferred to having submissions with insufficient supporting data and follow-up requests for information from the IMO.

With an extended NoD deadline and fewer Final statements for a given invoice billing period all the adjustments should be included in the next billing period invoice.