

**FINAL BILL TASK FORCE**  
**DRAFT - MARKET PARTICIPANT IDENTIFIED MILESTONES FOR 4-MONTH FINAL BILL CYCLE ACCEPTANCE**

CONCERN	CATEGORY	ELEMENT	ISSUE(S)	CAUSE(S)	IMPACT(S)	RESOLUTION	MILESTONE	METRIC REPORTING	SIGN-OFF INDICATOR
ACCURACY	DATA	MARKET	1. Post-initial invoice market data correction [e.g. prices]	Post-initial invoice performance tracking data scrubbing	Requires settlement adjustment	Correct all data prior to the issuance of the initial invoice.	0 retroactive data corrections after initial for 6 months		
ACCURACY	DATA	PERFORMANCE	2. Post-initial invoice performance tracking data correction	Post-initial invoice performance tracking data scrubbing	a Requires settlement adjustment. b Dispatch interval data recoveries introduce additional intervals and associated pricing into Settlements, affecting MP confidence in price certainty.	Correct all performance tracking data prior to the issuance of the initial invoice.	1. 0 retroactive data corrections after initial for 6 months 2. Work with joint BAWG-CDAS task force to identify Market accepted data replacement/smoothing methodologies. 3. Replace current PTS with enhanced processing under SMD which incorporates Market accepted data replacement/smoothing methodologies		
ACCURACY	DATA	METERING	3. Post final bill meter corrections	Meter Authority retail meter reading cycles may not coincide with wholesale market cycles.	Requires settlement adjustment or socialization of impacts via UFE allocation	Work with PSC & NYISO Committees to identify how a hardened cutoff may be accommodated.	Establish a process through which post-final metering corrections are addressed.		
ACCURACY	DATA	METERING	4. Current real-time metering infrastructure adequacy	No formal/coordinated metering accuracy program administration for wholesale metering systems	Metering system accuracies may not be maintained at specified levels.	Work with joint OC-BIC task force to assess the quality & accuracy of NYISO metering and develop a formal administrative process that provides positive confirmation of metering system accuracy.	1. Perform assessment of metering adequacy 2. Establish a formal administrative process that provides positive confirmation of metering maintenance per established specifications. 3. Provide a cost recovery mechanism for investments in metering infrastructure		
ACCURACY	DATA	METERING	5. Current revenue quality metering infrastructure adequacy	No formal/coordinated metering accuracy program administration for wholesale metering systems	Metering system accuracies may not be maintained at specified levels.	Work with joint OC-BIC task force to assess the quality & accuracy of NYISO metering and develop a formal administrative process that provides positive confirmation of metering system accuracy.	1. Perform assessment of metering adequacy 2. Establish a formal administrative process that provides positive confirmation of metering maintenance per established specifications. 3. Provide a cost recovery mechanism for investments in metering infrastructure		
ACCURACY	DATA	METERING	6. Functional & performance limitations of Web-based Metered MWh reconciliation	MPs have identified a number of enhancements to Web-rec, detailed in Appendix A	Less than optimal value of mechanism realized	Deployment of enhancements detailed in Attachment A			

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ACCURACY	DATA	MODELING	7. Concern over the integrity of software to eliminate Grouped units	Previous NYISO track record for software design & quality.	a Potential settlement misstatement due to flawed software design. b Skepticism of software integrity & resistance to shortening the settlement cycle	a Train MPs on how new business rules will be applied b Rely on established Market Participant Audit Committee process to provide reasonable assurance that process is functioning properly			
ACCURACY	DATA	MODELING	8. Retroactively created load and generator bus point ids [PTIDs]	TO nor MP communicated to NYISO the initiation of market activity in some sub-zones	a Market activity not accounted for in NYISO settlements b Affects UFE and Market cost allocations c Requires retroactive settlement adjustment	Not anticipated to be an issue going forward due to NYISO policy changes.			
ACCURACY	DATA	SETTLEMENT	9. Significant amount of manually implemented settlements.	Implementation of Market mechanism prioritized higher than implementation of settlement mechanism.	Requires settlement adjustment	Implement settlement mechanisms at the same time market products deployed	1. Incorporate all settlement business rules within the BAS. 2. Demonstrate that settlement mechanism can be deployed simultaneously with market mechanism for at least one market enhancement.		
ACCURACY	DATA	SETTLEMENT	10. Some settlement determinant data unavailable to MPs.	a Requirement to report J & K sub-zonal loads in aggregate b Results of some intermediate settlement calculations not stored & unavailable for reporting	MPs unable to reconcile their settlements which impacts MP confidence in settlement accuracy.	a Rescind BIC requirement to report J & K sub-zonal loads in aggregate b Pursue completion of intermediate calc project.			
ACCURACY	DATA	SETTLEMENT	11. Migration from legacy csv formatted advisory postings to DSS application	DSS provides a more robust mechanism to deliver information and is scheduled to replace the old process, causing MPs to develop necessary integration with new delivery mechanism.	a MPs must develop necessary integration with new delivery mechanism. b MPs must be trained in DSS & Business Objects applications.	a Validate the functionality of the DSS ADD mechanism. b Train MPs in DSS & Business Objects applications.			
ACCURACY	DATA	SETTLEMENT	12. Market Participant inability to identify anomalous residual adjustment & uplift balances	Cost drivers may not be readily visible to MPs	Lack of confidence in ancillary services costs due to inability to determine cost drivers	Work with BAWG to establish thresholds for account balances which would trigger timely analyses & the reporting of the drivers behind those balances			
ACCURACY	DATA	SETTLEMENT	13. Invoice level details for Final Bill Close-out not available at the same time advisory settlement details available during 30 day viewing period prior to invoicing	Consolidated Invoice mechanism does not allow invoice data to be posted in draft.	MPs may not have a comprehensive view of all financial impacts from FBC close-out settlements prior to invoicing	Provide for enhancement of the Consolidated Invoice mechanism.			

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ACCURACY	DATA	ORGANIZATIONAL	14. Transfer of accounts retroactively for sold assets	a MIS architecture security prohibits access to settlement information billed under the predecessor org by successor org b Inability to assign "org of record" retroactively	No visibility of settlement data for org taking over assets	a Modify the MIS database to provide for the retroactive assignment of financial responsibility b Pursue any associated tariff modifications necessary to allow retroactive assignment of financial responsibility			
ACCURACY	DATA	ORGANIZATIONAL	15. Transfer of accounts retroactively for bankrupt orgs	a MIS security prohibits access to settlement information billed under the predecessor org by successor org b Inability to assign "org of record" retroactively	Inclusion of bankrupt org in settlement results in bad dept declaration	None recommended; OATT Schedule 1 provides for the treatment of Bad Debt.			
ACCURACY	DATA	ORGANIZATIONAL	16. Can not transfer meter authorities retroactively	Web-based Metered MWh Reconciliation mechanism does not currently date sensitize Meter Authority responsibility.	Meter Authorities must effectively coordinate the submission of data impacting the timeliness of processing.	Modify Web-rec to provide for date sensitized Meter Authority designation			
ACCURACY	SETTLEMENT	BUSINESS RULES	17. Accounting & Billing Manual out of date	Revised manual currently under Legal review prior to release	Inability to accurately reconcile settlements	Post & maintain revised manual			
ACCURACY	SETTLEMENT	BUSINESS RULES	18. Concern over the Integrity of SMD software to	Previous NYISO track record for software design & quality.	a Potential settlement misstatement due to flawed software design. b Skepticism of software integrity	a Fully test SMD software during Market Trials and subsequent development. b Obtain MP confidence through effective communication of SMD business rule mechanics & MP training.			
ACCURACY	SETTLEMENT	BUSINESS RULES	19. MPs lack a "sandbox" environment to perform what-if analyses for determining settlement consistent with market activity	NYISO currently developing a billing simulator; however, making this mechanism available to MPs as a sandbox has not been factored into the scope of the project.	Lack of "what-if" analyses for data & software changes may result in less comprehensive testing of market designs.	a BAWG to draft White Paper on the benefits of pursuing the development of a Settlements sandbox environment for project consideration. b Utilize the functionality of the Business Objects toolset within DSS to facilitate sandbox capability.			

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ACCURACY	PROCESSING	PERFORMANCE TRACKING	20. Validation that CMD PTS is processing properly	Lack of confidence in billing determinant data	Lack of confidence in billing determinant data	<ul style="list-style-type: none"> <li>a Inform MPs of data correction/replacement methodologies</li> <li>b Work with CDAS &amp; BAWG to establish Market approved data smoothing &amp; replacement methodologies</li> <li>c Train MPs on how to access PTS data through DSS for timely anomaly detection/correction</li> <li>d MPs to rely on Market Participant Audit Committee process to provide reasonable assurance that processed accurately &amp; completely</li> </ul>			
ACCURACY	PROCESSING	PERFORMANCE TRACKING	21. Validation that SMD PTS is processing properly	Lack of confidence in billing determinant data	Lack of confidence in billing determinant data	<ul style="list-style-type: none"> <li>a Inform MPs of data correction/replacement methodologies</li> <li>b Work with CDAS &amp; BAWG to establish Market approved data smoothing &amp; replacement methodologies</li> <li>c Train MPs on how to access PTS data through DSS for timely anomaly detection/correction</li> <li>d MPs to rely on Market Participant Audit Committee process to provide reasonable assurance that processed accurately &amp; completely</li> </ul>			
ACCURACY	SETTLEMENT	MANUAL PROCESSING	22. Significant amount of manually implemented settlements.	Implementation of Market mechanism prioritized higher than implementation of settlement mechanism.	<ul style="list-style-type: none"> <li>a Due to issues of confidentiality, unable to provide MPs with the nature, reason, or cost drivers of these adjustments.</li> <li>b Creates cost allocation problems for MPs that may have contractual provisions that dictate recoverable costs from their customers.</li> <li>c Potential source of settlement inaccuracy due to human error</li> </ul>	<ul style="list-style-type: none"> <li>a Incorporate all settlement business rules within the BAS.</li> <li>b Demonstrate that settlement mechanism can be deployed simultaneously with market mechanism for at least one market enhancement.</li> </ul>			

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ACCURACY	SETTLEMENT	MANUAL PROCESSING	23. Significant amount of discretionary manual adjustments.	Settlement of negotiated dispute resolutions; Market Monitoring sanctions; and Discretionary Acts Committee resolutions.	<p>a Due to issues of confidentiality, unable to provide MPs with the nature, reason, or cost drivers of these adjustments.</p> <p>b Creates cost allocation problems for MPs that may have contractual provisions that dictate recoverable costs from their customers.</p> <p>c Potential source of settlement inaccuracy due to human error</p>	Work with BAWG to develop a reasonable mechanism to provide MPs with sufficient details of discretionary adjustments.			
ACCURACY	INVOICING	ORGANIZATIONAL	24. Transfer of accounts retroactively for sold assets	<p>a MIS architecture does not provide the capability to retroactively assign financial responsibility for settlements under the predecessor org to the successor org</p> <p>b Inability to assign "org of record" retroactively without over-writing old org data</p>	No visibility of settlement data for org taking over assets	<p>a Modify the MIS database to provide for the retroactive assignment of financial responsibility</p> <p>b Pursue any associated tariff modifications necessary to allow retroactive assignment of financial responsibility</p>			
ACCURACY	INVOICING	ORGANIZATIONAL	25. Orgs which have disbanded or bankrupt	<p>a MIS architecture does not provide the capability to retroactively assign financial responsibility for settlements under the predecessor org to the successor org</p> <p>b Inability to assign "org of record" retroactively without over-writing old org data</p>	Inclusion of bankrupt org in settlement results in bad dept declaration	None recommended; OATT Schedule 1 provides for the treatment of Bad Debt.			
FINALITY	DATA	MARKET	26. MPs have observed retroactive price corrections after initial settlement.	Integration problems/processing failures	<p>a Raises questions about NYISO adherence to price correction policies</p> <p>b Dispatch interval data recoveries introduce additional intervals and associated pricing into Settlements, affecting MP confidence in price certainty.</p>	Correct all data prior to the issuance of the initial invoice.	0 retroactive data corrections after initial for 6 months		

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FINALITY	DATA	PERFORMANCE	27. MPs have observed retroactive price corrections after initial settlement.	Post-initial invoice performance tracking data scrubbing	a Requires settlement adjustment.  b Dispatch interval data recoveries introduce additional intervals and associated pricing into Settlements, affecting MP confidence in price certainty.	Correct all performance tracking data prior to the issuance of the initial invoice.	1. 0 retroactive data corrections after initial for 6 months  2. Work with joint BAWG-CDAS task force to identify Market accepted data replacement/smoothing methodologies.  3. Replace current PTS with enhanced processing under SMD which incorporates Market accepted data replacement/smoothing methodologies		
FINALITY	DATA	METERING	28. Meter Authority retail meter reading cycles may not coincide with wholesale market cycles.	Wholesale/Retail Seams issue	Requires settlement adjustment or socialization of impacts via UFE allocation	Work with PSC & NYISO Committees to identify how a hardened cutoff may be accommodated.	Establish a process through which post-final metering corrections are addressed.		
FINALITY	SETTLEMENT	REGULATORY	29. Regulatory rulings whose settlements are applied retroactively		Requires either settlement adjustment or socialization of impacts via OATT Schedule 1	None recommended; either OATT Schedule 1 dispute resolution provisions dictate treatment or specifics of the Regulators' rulings provide guidance on disposition.			
FINALITY	SETTLEMENT	SETTLEMENT SOFTWARE	30. Retroactive software "bug fixes"		a Settlement misstatement due to flawed software design.  b Skepticism of software integrity	a Fully test software during development.  b Obtain MP confidence through effective communication of settlement business rule mechanics & MP training.  c Train MPs on how to reconcile settlements using documentation & DSS toolset  d MPs to rely on Market Participant Audit Committee process to provide reasonable assurance that processed accurately & completely			
FINALITY	SETTLEMENT	BUDGET BALANCING	31. Budget under-/over-run refunds/recoveries	Tariff provision	Budget under-/over-runs are balanced well after 4-month final invoicing may occur	None recommended; OATT Schedule 1 provisions dictate treatment			
ADMINISTRATION	FINANCIAL	CASH FLOW	32. None identified						
ADMINISTRATION	FINANCIAL	CLEARING	33. None identified						
ADMINISTRATION	FINANCIAL	REPORTING	34. None identified						
ADMINISTRATION	RESOURCES	STAFF	35. May require additional Staffing						
ADMINISTRATION	RESOURCES	SOFTWARE	36. May require enhanced reconciliation capabilities						

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ADMINISTRATION	RESOURCES	BUDGETARY	37. Additional Staffing & software requires budgetary resources						
ADMINISTRATION	RESOURCES	TECHNOLOGICAL	38. Will require Staff training in market toolsets						
ADMINISTRATION	PROCESS SUPPORT	MANUAL PROCESSING	39. May need to be replaced by automated processes						
ADMINISTRATION	PROCESS SUPPORT	SOFTWARE SOLUTIONS	40. None identified						
ADMINISTRATION	PROCESS SUPPORT	INTEGRATION	41. Is 4 months the correct cutoff? Should the final bill cycle be 6 months?						
ADMINISTRATION	GRID ACCOUNTING	MANUAL PROCESSING	42. May need to be replaced by automated processes						
ADMINISTRATION	GRID ACCOUNTING	SOFTWARE SOLUTIONS	43. None identified						
ADMINISTRATION	GRID ACCOUNTING	RECONCILIATION	44. None identified						
ADMINISTRATION	MARKET ACCOUNTING	MANUAL PROCESSING	45. None identified						
ADMINISTRATION	MARKET ACCOUNTING	SOFTWARE SOLUTIONS	46. None identified						
ADMINISTRATION	MARKET ACCOUNTING	RECONCILIATION	47. None identified						
ADMINISTRATION	DOCUMENTATION	SETTLEMENT PROCESSES	48. Accounting & Billing Manual unavailable						
ADMINISTRATION	DOCUMENTATION	BILLING ISSUES	49. Current posting mechanism does not appear to be sufficient						