

Alternate Proposal

- The alternate proposal is to use the LDA BRA Clearing Price for the Non-Performance Charge Rate in place of Net CONE
 - Non-Performance Charge Rate = (~~Net CONE~~ BRA Clearing Price (stated in terms of ICAP) for the LDA and Delivery Year for which such calculation is performed * (the number of days in the Delivery Year / 30) / (the number of Real-Time Settlement Intervals in an hour
- Also proposed is changing the annual stop-loss provision to align with the BRA Clearing Price
 - Non-Performance Charge Limit equal to 1.5 times the ~~Net CONE~~ BRA Clearing Price x MWs of UCAP committed x the number of days in the Delivery Year
 - For 23/24 DY - Stop-Loss would be \$18,686/MW vs \$150,540/MW
- Request expedited treatment from FERC for prospective implementation with effective date upon filing