

Please find attached section 4.2.9 of the ICAP Manual on Allocation of ICAP Rights with proposed modifications.

After a first reading of the modified version you sent me, I thought the corrections were OK. However, it quickly became clear the the word 'Initial' attached to the requests made in February and in October was creating two kinds of requests: those made at these periods and those made each month of the year which, in the text, are only referred to as 'requests' . Then later, the text was saying that supporting documents were to be received no later than 5 h. pm on the day following the initial request. Consequently, this rule seemed to apply only to the initial request and not to the (ordinary) requests made every other months of the year, which I think is not the intention of the manual.

The correction I wanted to make at the BIC was really to distinguish between the 'Request Sheet' (the request), which is the document with which participants get their priority, and the 'Supporting Documents' which are to be sent at a later time to support the request.

With this in mind, I made the following corrections which are aimed at clarifying the process and not at making any substantive change.

- Got rid of the word 'Initial', and keep the word 'Request' to describe any request, i.e. the first sheet that is sent to the ISO
- Make sure from the beginning of the 'Other Allocation' section that participants submit the 'Request' AND the 'Supporting Documents'
- Create headings for 'Request' and for 'Supporting Documents' to help make clear that these are two distinct documents
- Add a sentence in the 'Request' section that indicates that the NYISO provides a 'Request Sheet'
- Create a heading for 'Priority' to ease the identification of the text discussing this issue and grouping all information related this issue
- Clarify the 'Priority' section by adding that the priority assigned to a request assumes that supporting documents will be received within the time period allowed and by transferring a sentence from another section indicating that 'Late submissions of supporting documentation will result in automatic rejection of the underlying Import rights request'.

I hope these modifications will be in accordance with your views too. Please feels free to call me to discuss these corrections.

Thanks

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