

NYISO Schedule & Pricing Working Group November 29, 2005

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Overview of FERC Docket for Virtual Transactions ("VT")

- > Original Virtual Transactions Credit Calculation:
 - Daily trading limit (MWHs) x \$ price delta at 97th percentile x 7 days
- In response to NYISO's request to reduce the multiplier from 7 to 4 days, FERC required the following:
 - 1. Reduce the multiplier of collateral from 7 days to 2 days;
 - 2. Consider a reduction of the price delta used in the calculation from the 97th percentile to the 50th percentile; and
 - 3. Examine and report on effects of further reducing the multiplier to 1 day.

Virtual Transactions Collateral Reduction Update Overview of FERC Docket for Virtual Transactions - continued

	NYISO Proposal	FERC Response	Due Dates
Net Receivable	Acceptable form of collateral	Accepted	Immediately
Price Differential Percentile	Silent [Implies Status Quo of Maintaining 97 ^{th]}	Ordered NYISO to evaluate and report on why 97 th percentile is proper	Compliance filing made 8/15/2005
Multiplier	4 days	2 days	Compliance filing made 7/22/05
		1 day [work with MPs to evaluate effects of reducing to 1 day]	Report due December 29, 2005

Actions:

- 1. NYISO is analyzing 2005 data regarding potential credit losses for the following scenarios:
 - 97th percentile and 2 days;
 - 97th percentile and 1 day;
 - 50th percentile and 2 days; and
 - 50th percentile and 1 day
- 2. After a competitive request for proposal, NYISO retained LECG to perform comprehensive study of current VT credit requirements. Using empirical research, LECG will examine appropriateness of:
 - Percentile calculation [97th vs. 50th or somewhere in between]
 - 90-day rolling average of percentile calculation
 - 2 day factor vs. 1 day factor

Actions – (continued):

- 3. Report will be done by end of December, however NYISO may request 30-day extension for the FERC report due December 29th to allow review of results with NYISO stakeholders and inclusion of study results in the report to FERC
- 4. Other Items to Review with CPTF/S&P Working Group Related to Virtual Transactions
 - Allowance of a Corporate Guaranty as a form of collateral and unsecured credit
 - Reduce time in which MP must comply with a margin call from 24 hours to same day [only when MP's cumulative losses have exceeded 50% of collateral posted]
 - Replace Virtual Transactions Certification form with email to increase or decrease daily trading limit