Summary of NYISO Response to FERC Policy Statement on Credit Issues

TRANSPARENCY

- NYISO agrees with need for transparency in customer credit requirements.
- NYISO credit requirements are established in detail in its tariffs.
- True transparency requires customer understanding of policies.
 - 1. Detailed written calculations upon request
 - 2. NYMOC Course
 - 3. Additional procedures will be posted on NYISO website

• QUANTITATIVE AND QUALITATIVE EVALUATION

- NYISO agrees that both types of indicators should be considered.
- NYISO approach has been to incorporate specific qualitative factors into its policies.
 - 1. Credit Assessment methodology
 - 2. Unique customer classes
 - 3. Equivalency Ratings

Draft - For Discussion Only

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SHORTENED SETTLEMENT CYCLE

- Similar benefits offered by Prepayment and Pay-down programs.
- Formal study conducted by R.J. Rudden.
- NYISO will continue to seek stakeholder input

NETTING

- NYISO offers two of three types of netting cited by Commission.
- Provision for netting of internal bilaterals has been added to NYISO project list