

## 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

## Friendly Amendment

### Other Change (not necessarily embedded exclusively in the OATT):

Revise the PAI trigger as proposed by PJM in the PJM CIFP proposal:

PAI only triggered for all intervals where there is i) a real-time reserve shortages AND ii) declaration of a real-time emergency procedure more severe than Pre-Emergency DR

Manual changes will be required.

## Posted language – April 26, 2023

### Emergency Action

“Emergency Action” shall mean the implementation of any shortage pricing in real-time for a Reserve Zone or Sub-zone as described in Operating Agreement, Schedule 1, section 2.5.1, and the parallel provisions of Tariff, Attachment K-Appendix, section 2.5.1, where there is also an active emergency action that encompasses such Reserve Zone or Sub-zone that for locational or system-wide capacity shortages that either utilizes pre-emergency mandatory load management reductions or other emergency capacity, or initiates a more severe action including, but not limited to, a Voltage Reduction Warning, Voltage Reduction Action, Manual Load Dump Warning, or Manual Load Dump Action.

Manual changes will be required.