

Prepayments for PMA Reduction

OPTIONS MATRIX Strive for simplicity

					Solution Options ²
#	Design Components ¹	Priority	Status Quo	A	в
1	Invoice items subject to PMA		All except FTR	Also exclude Virtual Transactions and Exports	
2	Structure		One-tier by definition but two-tier when Current Exposure requirement considered	Two - Lead-Lag - historical and	
3	Current Exposure (CE) requirement		Current exposure can't exceed Working Credit Limit (75% of available credit)	Extrapolate Current Exposure to include collateral breach cure period	
4	Leading component		Current Exposure requirement	Extrapolation of potential billing using forward index such as ICE prices	Other "Seasonal" indicator
5	Lagging Component		Highest three weeks invoices during current 6-month cycle with semiannual reset	Status Quo but monthly reset based on Participant's last month's actual 3 week peak and following month's historical share of load costs; maintain CE requirement.	Reduce three week Peak (e.g. use second highest in 6 months, or other measure), but increase/ extend CE req'mt and remove Prepay option. May allow for use of some CE collateral to partial pay invoices.
6	Prepayment* Eligibility		Only Participants with Unsecured Credit Allowance	All Participants	Complete removal
7	Prepayment Dollar limits		Capped at Participant's Unsecured Credit Allowance	Unlimited	
8	Prepayment Frequency		Ten per rolling 12 months	Unlimited	8 per PMA reset period
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	* In this discussion, "Prepayment" means prepayment	of invoice resulting	in a reduction to the PMA credit requi	irement	

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	75% leading and 25% lagging indicators; credit exposure equal to weighted median credit exposure for one day * 7	
	one week of projected market activity; use forward markets for price (hub prices as surrogate); daily projected activity * daily projected price (for one week); then take median activity \$ exposure for one week	
	Median \$ activity exposure for 3 weeks	
Complete removal if PMA solution includes nore frequent reset		