

DA/RT Exposure Calculation Alignment

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DC Energy supports a comprehensive review of credit exposure calculations

Exposure Calculation Reform

- **DC Energy supports the review of credit exposure calculations to see where targeted improvements can be made**
- **Our desire is to align the exposure calculations to better reflect the actual risk of a market participant's activity**
 - Instances where calculated risk is overstated (“over-collateralized”) can lead to less market activity and higher liquidity premiums that are passed to load
 - Instances where calculated risk is understated (“under-collateralized”) the market is exposed to default uplift risk
 - We seek to address gaps on both sides of the issue



The credit calculations should reflect the interdependency of real-time and day-ahead exposure

Exposure Calculation Enhancements

- In order to reflect actual risk, the calculated exposure for the day-ahead and real-time need to be taken together so they are based on the same period of days and extrapolation factors
- Today there is a temporal mismatch on both the future liability side and the unbilled side of the Estimated Aggregate Liability calculation
- Moreover, on the unbilled side there is a stark mismatch in the application of the unbilled extrapolation factor “M2”



A closer examination of the EAL credit calculation shows significant misalignment in how real-time and day-ahead exposure is calculated

Examination of EAL Components

-DA/RT comparison of days and "M" factors-

DA	RT		SUM			
	Liability For FUTURE Activity		Liability For PAST but Unpaid Activity			
	MAX		MAX			
Date	RFAF*RTLE	RTLF	DFAF*DALE	URTA	RTLCNS	UDAA
2023-06-22						sum of activity in this window
2023-06-21						
2023-06-20						
2023-06-19		~1.5 x sum of activity in this window	M1 x DFAF x average in this window		sum of activity in this window	
2023-06-18						
2023-06-17						
2023-06-16						
2023-06-15						
2023-06-14						
2023-06-13						
2023-06-12						
2023-06-11						
2023-06-10						
2023-06-09						
2023-06-08	M1 x RFAF x max 14-day average in this window					
2023-06-07				M2 x max 14-day average in this window		
2023-06-06						
2023-06-05						
2023-06-04						
2023-06-03						
2023-06-02						
2023-06-01						
2023-05-31						
2023-05-30						
2023-05-29						
2023-05-28						

#3 Mismatch: Relatively minor and is correct because it reflects actual invoice timing difference. Could be minimized by accelerating the invoice and cash clearing cycle, although that is not the proposal at hand.

#2 Mismatch: There is no offset for day-ahead activity. If day-ahead activity is a purchase, then the lack of consideration leads to a negative credit gap (i.e., undercollateralization)

#1 Mismatch: RT and DA are misaligned: (i) Days for the extrapolated RTLE and DALE are significantly misaligned; and (ii) DALE is assessing a different period than RTLF due to the DFAF. This can produce positive and negative gaps when comparing calculated exposure to invoice exposure, E.g. negative gap when the offset for DA activity is higher than the DAL corresponding to the max RTL period

Acronym key
 RFAF= Real-Time Forward Adjustment Factor
 RTLE= Real-Time Liability Extrapolated
 RTLF= Real-Time Liability Forward
 DALE= Daily Day-Ahead Liability Extrapolated
 DFAF= Day-Ahead Forward Adjustment Factor
 URTA= Unbilled Real-Time Amount
 RTLCNS= Real-Time Liability Completed and Not Settled
 UDAA= Unbilled Day-Ahead Amounts



The EAL calculation can dramatically overcollateralize as demonstrated by a 50MW energy only sale traded every hour from Jan. to Apr. 2021

EALt vs Cumulative Profit and Loss

- 50MW Energy Only Sale Around The Clock, Fees Excluded-

