

Red Flag Situations that Should be Discussed with Legal and Compliance Depts.

- Acts inconsistent with compliance manual.
- Trades that cancel each other out economically (possible wash trade).
- Dramatic differences in bidding behavior from one period to another.
- Angst about repairing a unit or availability of a unit, repairing a unit too slowly or repairing a unit too quickly - a patch job - to qualify for ISO revenues.
- Too good/too easy, to be true
- A small group that releases interstate pipeline capacity among each other (possible capacity release flipping violation) or a mismatch between the corporate entity that owns the interstate pipeline capacity and the entity that has title to gas (possible shipper-must-have-title capacity release violation).