



January 26, 2026

Ms. Debbie-Anne A. Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: *Adelphia Gateway, LLC*  
Docket No. RP26-\_\_\_-000  
Emergency Tariff Filing and Request for Waivers – OFO Penalties

Dear Ms. Reese:

Pursuant to Section 4 of the Natural Gas Act<sup>1</sup> and Section 154.204 of the regulations of the Federal Energy Regulatory Commission (“FERC” or “Commission”) promulgated thereunder,<sup>2</sup> Adelphia Gateway, LLC (“Adelphia”) hereby submits for filing and acceptance by the Commission as part of its Original Volume No. 1 FERC Gas Tariff (“Tariff”), the following tariff records to be effective on January 26, 2026:

**FERC Gas Tariff**

<b><u>Version</u></b>	<b><u>Section (Description &amp; Title, Narrative Name)</u></b>
	<i>Part 6 – General Terms and Conditions</i>
1.0.0	13.8 Penalties

**STATEMENT OF NATURE, REASONS AND BASIS**

Adelphia is making this emergency filing as a result of the ongoing winter storm that threatens the integrity of the Adelphia pipeline system. The filing seeks to protect its system and its firm shippers by ensuring that all Shippers are adequately deterred from undertaking unauthorized activities on its system and to ensure that Adelphia is able to recover all Operational Flow Order ("OFO") penalties imposed on it by its upstream interconnecting pipelines during emergency weather conditions that are caused by unauthorized overruns. Accordingly, Adelphia is proposing to modify the OFO penalty price in Section 13.8 of its Tariff as described further herein and seeks an effective date of January 26, 2026 of the approval of this tariff change filing.

On January 23, 2026, pursuant to Section 13 (Operational Flow Orders) of the General Terms and Conditions of the Tariff, Adelphia issued an OFO in anticipation of the current intensely cold weather and record levels of market demand on its system. The OFO directs Shippers to stay within their contractual limitations and maintain ratable gas flows over a 24-hour day as required under their service agreements. Because of the restrictions placed on Adelphia through OFOs issued by its upstream interconnecting pipelines, unratable hourly takes, unauthorized overruns and operator underperformance by Adelphia’s Shippers threatens Adelphia's ability to maintain its system integrity and meet its firm obligations to Shippers.

Despite the restrictions and penalties already in place under its existing Tariff, Adelphia is increasingly concerned that the current extreme elevated prices for electricity in the PJM wholesale power markets and severe

<sup>1</sup> 15 U.S.C. § 717c (2025).

<sup>2</sup> 18 C.F.R. § 154.204 (2025).

PJM penalties for non-performance by power generators may incentivize some of its Shippers to deliberately overrun their firm entitlements on Adelphia if the penalties for such unauthorized flows on Adelphia are not increased to a level sufficiently high to deter the unauthorized behavior. Adelphia has very limited line pack and no storage, and therefore non-ratable takes, even by a single Shipper, could jeopardize the operational integrity of Adelphia's system. Thus, unauthorized overrun activity at this time could cause Adelphia's system to fail rapidly, with potentially severe consequences to other firm shippers and the integrity of Adelphia's system. Further, because of the higher OFO penalty structures of Adelphia's upstream interconnecting pipelines relative to Adelphia's OFO penalty structure, there is real potential for Adelphia to suffer substantial damages in the event that Shippers were to engage in harmful conduct. Adelphia's current OFO penalty structure, as set forth in Section 13.8 of its Tariff, relies on Gas Daily indices, which is unlikely to sufficiently deter harmful conduct given the economic considerations described herein and the higher OFO penalty structures on Adelphia's interconnecting pipelines discussed below.

To ensure Shippers stay within contractual limitations, and refrain from unratable hourly takes and unauthorized overruns or operator underperformance, on January 26, 2026, contemporaneously with this filing, Adelphia issued an update of its currently effective OFO putting all Shippers on notice of the increased OFO penalties that Adelphia will impose and is seeking acceptance of by the Commission here. Specifically, Adelphia proposes to modify the OFO penalty price referenced in Section 13.8 of its Tariff to be the High Common price posted for the Day on which the violation occurred as defined in its Tariff instead of the average cashout price which is currently identified as the penalty price which is multiplied by 500% and each Dekatherm of Gas by which Shipper/point operator deviated from the requirements of the OFO. In addition, Adelphia proposes new language in Section 13.8 to give Adelphia the ability to recover any OFO penalties imposed on it by its interconnecting pipelines that supply Adelphia due to Shipper violations of Adelphia's OFO. Such interconnecting pipelines vary by zone on Adelphia's system: Zone North A (Texas Eastern Transmission, LP, Columbia Gas Transmission, LLC or Transcontinental Gas Pipe Line Company, LLC), Zone North B (Transcontinental Gas Pipe Line Company, LLC) and Zone South (Texas Eastern Transmission, LP). In the event one or more of the aforementioned pipelines imposes OFO penalties on Adelphia because of an Adelphia Shipper's failure to abide by the restrictions in an Adelphia OFO, Adelphia proposes to charge the higher of its own OFO penalty and the interconnecting pipeline's OFO that Adelphia is subject to due to the Shipper's violation(s) of Adelphia's OFO.

In addition, Adelphia advised, as part of this updated OFO, that nothing in its Tariff precludes Adelphia from pursuing any and all remedies at law or equity against any Shipper that knowingly and willfully disregards Adelphia's OFOs and causes damage to Adelphia's system or impairs its ability to maintain the integrity of its system and meet its firm obligations to other shippers.

## **PROPOSED EFFECTIVE DATE**

Adelphia requests that the tariff records herein become effective January 26, 2026. Adelphia respectfully requests waiver of any notice requirement contained in Section 157.207 of the Commission's regulations that may be applicable, and any other waivers that may be required for the Commission to accept the tariff records filed herein to become effective as proposed.

## **IMPLEMENTATION**

Pursuant to Section 154.7(a)(9) of the Commission's regulations, 18 C.F.R. § 154.7(a)(9), Adelphia files this emergency motion to place the revised tariff records filed herein into effect at the expiration of any suspension period set by the Commission, provided that the Tariff changes are approved as filed and without condition. In the event the Tariff records filed herewith are not approved as filed and without condition, Adelphia reserves the right to file a motion at a later date to place such tariff records into effect.

## LIST OF MATERIALS ENCLOSED

The following materials are submitted herewith in an XML filing package in accordance with the requirements of the eTariff program set forth in Order No. 714:<sup>3</sup>

1. This transmittal letter;
2. The proposed Tariff records identified above;
3. Appendix A, a pdf file of the proposed Tariff records to be effective January 26, 2026 for posting on the Commission's eLibrary, including redlined Tariff records showing the changes reflected in the Tariff records filed herein, consistent with Section 154.201(a) of the Commission's regulations;<sup>4</sup>
4. A certificate of service certifying that all materials listed in this "List of Materials Enclosed" section have been served on customers of Adelpia Gateway, LLC and interested state commissions that have requested electronic service.

## CORRESPONDENCE AND COMMUNICATION

All correspondence and communication regarding this filing should be addressed to the following:

\*William P. Scharfenberg  
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Director, Rates and Regulatory  
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\*Adelpia respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow each of these persons to be included on the Commission's official service list.

## CERTIFICATE AND ELECTRONIC FILING

The undersigned certifies that he has read the filing and knows its contents; the contents are true as stated to the best knowledge and belief of the signer; and the signer possesses full power and authority to sign the filing.

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<sup>3</sup> *Electronic Tariff Filings*, Order No. 714, III FERC Stats. & Regs., Regs. Preambles ¶ 31,276 (2008), *order establishing procedures*, 130 FERC ¶ 61,047, *order establishing baseline filing schedule*, 130 FERC ¶ 61,228 (2010), *final rule*, Order No. 714-A, III FERC Stats. & Regs. ¶ 31,356 (2014).

<sup>4</sup> 18 C.F.R. § 154.201(a) (2025).

## COMPLIANCE WITH REGULATIONS

In compliance with Section 154.4(c) of the Commission's regulations, 18 C.F.R. § 154.4(c), all contents of this filing are being submitted as part of an XML filing package in conformance with the Secretary of the Commission's instructions.

In compliance with Section 154.201(a) of the Commission's regulations, 18 C.F.R. § 154.201(a), marked versions of the proposed Tariff records showing additions to and deletions from the currently effective Tariff records are attached.

As required by Section 154.2(d) and Section 154.208 of the Commission's regulations, copies of this filing are available for public inspection during regular business hours in a convenient form and place at the offices of Adelfia at 1415 Wyckoff Road, Wall, NJ 07719, and are being mailed to each of Adelfia's customers and interested state regulatory commissions. A paper copy of this filing may only be served if a customer or interested state commission has been granted a waiver of electronic service pursuant to Part 390 of the Commission's regulations, 18 C.F.R. Pt. 390.

Should you have any questions concerning this filing, please contact the undersigned at (832) 469-7988.

Sincerely,

Austin Isensee  
Director, Rates and Regulatory  
Adelfia Gateway, LLC

Attachments

## CERTIFICATE OF SERVICE

I hereby certify that I have electronically served the foregoing document upon customers of Adelpia Gateway, LLC and interested state commissions that have requested electronic service.

Dated at Washington, D.C. this 26th day of January, 2026.

Kevin M. Downey  
Attorney for Adelpia Gateway, LLC



732-938-1000



[www.adelphiagateway.com](http://www.adelphiagateway.com)



2500 CityWest Blvd, Suite 1775, Houston, TX 77042

**APPENDIX A**  
**CLEAN AND REDLINE TARIFF RECORDS**

### 13. OPERATIONAL FLOW ORDERS (“OFOs”)

- 13.1 Notification of Conditions that May Require the Issuance of an OFO or Action Alert: Transporter shall provide prior notice, via posting on the EBB and to affected Shippers and point operators through the affected party’s choice of Electronic Delivery Mechanism(s), of upcoming events that may affect Transporter’s pipeline system such as anticipated weather patterns or operational situations that may necessitate the issuance of an OFO pursuant to this Section 13.
- 13.2 Circumstances Warranting Issuance of an Operational Flow Order: Transporter shall have the right to issue Operational Flow Orders as specified in this Section 13 that require actions by Shippers/point operators in order (1) to alleviate conditions that threaten to impair Transporter’s ability to provide reliable service, (2) to maintain pipeline operations at the pressures required to provide efficient and reliable service, (3) to have adequate Gas supplies in Transporter’s system to receive and deliver Gas consistent with its firm Transportation Service obligations, (4) to maintain Transportation Service to all firm Shippers and for all firm Transportation Services, and (5) to maintain Transporter’s system in balance for the foregoing purposes. Transporter shall lift any effective Operational Flow Order, promptly upon the cessation of operating conditions that caused the relevant system problem(s). Routine repairs and maintenance will not be used as a basis for issuing OFOs. Transporter will plan routine repairs and maintenance by scheduling such activities in advance.
- 13.3 Voluntary Actions to be Taken to Avoid Issuance of an Operational Flow Order: Transporter shall, to the extent practicable, take all reasonable actions necessary to avoid issuing an Operational Flow Order. Such actions may include (1) working with point operators to temporarily adjust, by mutual agreement, receipts and/or deliveries at relevant Receipt Point(s) or Delivery Point(s), (2) working with Shippers/point operators to adjust, by mutual agreement, scheduled flows on Transporter’s system, (3) issuing an Action Alert designed to mitigate the conditions which, if continued, would require the issuance of an Operational Flow Order, or (4) taking any other reasonable action designed to mitigate the system problem. After taking all such reasonable actions to avoid issuing an Operational Flow Order, Transporter will have the right to issue Operational Flow Orders, if necessary, in the circumstances described in Sections 13.2 and 13.7.
- 13.4 Applicability of Operational Flow Orders or Action Alerts: Transporter shall issue an Operational Flow Order or Action Alert as localized as is reasonably practicable based on Transporter’s good faith judgment concerning the situations requiring remediation such that an Operational Flow Order or Action Alert will be directed (1) to Shippers/point operators causing the problem necessitating the Operational Flow Order or Action Alert or transporting Gas in the area of Transporter’s system in which there is an operational problem, and (2) to those Shippers/point operators transporting Gas in the area of Transporter’s system where action is required to

correct the problem necessitating the Operational Flow Order or Action Alert. Transporter will tailor the Operational Flow Order or Action Alert to match the severity of the known or anticipated operational problem requiring remediation as more fully set forth in subsections 13.6 and 13.7.

- 13.5 Notice: All Operational Flow Orders and Action Alerts will be issued via posting on the EBB to be followed by facsimile or telephone notification to the affected Shippers and point operators and notification to the affected parties through the affected party's choice of Electronic Delivery Mechanism(s). The Operational Flow Order/Action Alert will set forth (1) the time and date of issuance and effectiveness, (2) the actions a Shipper/point operator is required to take, (3) the time by which a Shipper/point operator must be in compliance with the Operational Flow Order/Action Alert, (4) the anticipated duration of the Operational Flow Order/Action Alert, and (5) any other terms that Transporter may reasonably require to ensure the effectiveness of the Operational Flow Order or Action Alert. Each Shipper and point operator must designate one or more persons for Transporter to contact on operating matters at any time, on a 24-Hour a day, 365-day a year basis. Such contact persons must have adequate authority and expertise to deal with such operating matters. If Transporter cannot contact any Shipper/point operator because that Shipper/point operator has failed to designate a contact person or Shipper's/point operator's contact person is unavailable, Transporter shall not be responsible for any consequences that result from its subsequent actions taken to alleviate the system problem. Transporter, however, will make reasonable continuing efforts to notify the affected Shipper/point operator. In addition to the other information contemplated by this Section 13.5, such notice shall also include information about the status of operational variables that determine when an Operational Flow Order or Action Alert will begin and end, and Transporter shall post periodic updates of such information, promptly upon occurrence of any material change in the information. Transporter will post a notice on the EBB informing the Shipper/point operator when any Operational Flow Order or Action Alert in effect will be cancelled and specifying the factors that caused the Operational Flow Order or Action Alert to be issued and then lifted, to the extent such factors are known.
- 13.6 Action Alerts: In the event that, in Transporter's judgment, action is required to avoid a system integrity issue, Transporter may issue Action Alerts.
- (a) Issuance of Action Alerts: Action Alerts will be noticed in accord with the procedures set forth in Section 13.5 and will be issued a minimum of four hours, or such shorter period of time as Transporter deems reasonable under the circumstances, prior to the required action by the Shipper/point operator.
  - (b) Required Actions: Action Alerts can be issued to effect any of the following:
    - (i) curtailment of interruptible services;

- (ii) restrictions of receipts or deliveries at specific Receipt or Delivery Point(s) covered by an Operational Balancing Agreement to the aggregate MDQ under the firm Agreements whose Primary Receipt Points and/or Primary Delivery Points are at the affected locations;
- (iii) forced balancing such that point operators will be required to assure that nominations equal flows or that receipts and deliveries fall within the tolerance level designated in the Action Alert; and/or
- (iv) any action required to maintain the integrity of Transporter's System.

13.7 Operational Flow Orders: In the event that (1) Shipper/point operator does not respond to an Action Alert, or (2) the actions taken thereunder are insufficient to correct the system problem for which the Action Alert was issued, or (3) there is insufficient time to carry out the procedures with respect to Action Alerts, Transporter may periodically take unilateral action, including the curtailment of firm Transportation Service, to maintain the operational integrity of Transporter's system (or any portion thereof). For purposes of this Section 13.7, the operational integrity of Transporter's system shall encompass the integrity of the physical system and the preservation of physical assets and their performance, the overall operating performance of the entire physical system (or any portion thereof), and the maintenance (on a reliable and operationally sound basis) of total system deliverability and the quality of Gas delivered. Notice of an Operational Flow Order will be provided pursuant to and in accordance with Section 13.5 above.

13.8 Penalties: If a Shipper/point operator fails to comply with an Action Alert or Operational Flow Order, the Shipper/point operator shall be subject to a penalty as follows:

Action Alert penalty for each Dekatherm of Gas by which Shipper/point operator deviated from the requirements of the Action Alert equal to the product of 200% times the average Cashout price as determined pursuant to Section 8.7(a) of these General Terms and Conditions, for each Day that said Action Alert is in effect.

Operational Flow Order penalty for each Dekatherm of Gas by which Shipper/point operator deviated from the requirements of the Operational Flow Order equal to the higher economic value of (1) the product of 500% times the ~~average~~ Cashout ~~High Common~~ price as determined pursuant to Section 8.7(a) of these General Terms and Conditions and each Dekatherm of Gas by which Shipper/point operator deviated from the requirements of the OFO and (2) the total economic value of any charges imposed or derived from the applicable interconnecting pipeline's OFO penalty rate that Adelpia is subject to, for each Day that said Operational Flow Order is in effect.

Any penalty revenues received by Transporter as a result of the operation of Section 13.8 above will be credited pursuant to Section 23.2 of the General Terms and Conditions.

- 13.9 Liability of Transporter: Transporter shall not be liable for any costs or damages incurred by any Shipper/point operator in complying with an Operational Flow Order. Transporter shall not be liable for any costs or damages that result from any interruption in Shipper's/point operator's service that is a result of a Shipper's/point operator's failure to comply promptly and fully with an Operational Flow Order. Shipper/point operator shall indemnify Transporter against any claims of liability, provided, however, that Transporter shall use reasonable efforts to minimize any such costs or damages.



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- 13.1 Notification of Conditions that May Require the Issuance of an OFO or Action Alert: Transporter shall provide prior notice, via posting on the EBB and to affected Shippers and point operators through the affected party’s choice of Electronic Delivery Mechanism(s), of upcoming events that may affect Transporter’s pipeline system such as anticipated weather patterns or operational situations that may necessitate the issuance of an OFO pursuant to this Section 13.
- 13.2 Circumstances Warranting Issuance of an Operational Flow Order: Transporter shall have the right to issue Operational Flow Orders as specified in this Section 13 that require actions by Shippers/point operators in order (1) to alleviate conditions that threaten to impair Transporter’s ability to provide reliable service, (2) to maintain pipeline operations at the pressures required to provide efficient and reliable service, (3) to have adequate Gas supplies in Transporter’s system to receive and deliver Gas consistent with its firm Transportation Service obligations, (4) to maintain Transportation Service to all firm Shippers and for all firm Transportation Services, and (5) to maintain Transporter’s system in balance for the foregoing purposes. Transporter shall lift any effective Operational Flow Order, promptly upon the cessation of operating conditions that caused the relevant system problem(s). Routine repairs and maintenance will not be used as a basis for issuing OFOs. Transporter will plan routine repairs and maintenance by scheduling such activities in advance.
- 13.3 Voluntary Actions to be Taken to Avoid Issuance of an Operational Flow Order: Transporter shall, to the extent practicable, take all reasonable actions necessary to avoid issuing an Operational Flow Order. Such actions may include (1) working with point operators to temporarily adjust, by mutual agreement, receipts and/or deliveries at relevant Receipt Point(s) or Delivery Point(s), (2) working with Shippers/point operators to adjust, by mutual agreement, scheduled flows on Transporter’s system, (3) issuing an Action Alert designed to mitigate the conditions which, if continued, would require the issuance of an Operational Flow Order, or (4) taking any other reasonable action designed to mitigate the system problem. After taking all such reasonable actions to avoid issuing an Operational Flow Order, Transporter will have the right to issue Operational Flow Orders, if necessary, in the circumstances described in Sections 13.2 and 13.7.
- 13.4 Applicability of Operational Flow Orders or Action Alerts: Transporter shall issue an Operational Flow Order or Action Alert as localized as is reasonably practicable based on Transporter’s good faith judgment concerning the situations requiring remediation such that an Operational Flow Order or Action Alert will be directed (1) to Shippers/point operators causing the problem necessitating the Operational Flow Order or Action Alert or transporting Gas in the area of Transporter’s system in which there is an operational problem, and (2) to those Shippers/point operators transporting Gas in the area of Transporter’s system where action is required to

correct the problem necessitating the Operational Flow Order or Action Alert. Transporter will tailor the Operational Flow Order or Action Alert to match the severity of the known or anticipated operational problem requiring remediation as more fully set forth in subsections 13.6 and 13.7.

- 13.5 Notice: All Operational Flow Orders and Action Alerts will be issued via posting on the EBB to be followed by facsimile or telephone notification to the affected Shippers and point operators and notification to the affected parties through the affected party's choice of Electronic Delivery Mechanism(s). The Operational Flow Order/Action Alert will set forth (1) the time and date of issuance and effectiveness, (2) the actions a Shipper/point operator is required to take, (3) the time by which a Shipper/point operator must be in compliance with the Operational Flow Order/Action Alert, (4) the anticipated duration of the Operational Flow Order/Action Alert, and (5) any other terms that Transporter may reasonably require to ensure the effectiveness of the Operational Flow Order or Action Alert. Each Shipper and point operator must designate one or more persons for Transporter to contact on operating matters at any time, on a 24-Hour a day, 365-day a year basis. Such contact persons must have adequate authority and expertise to deal with such operating matters. If Transporter cannot contact any Shipper/point operator because that Shipper/point operator has failed to designate a contact person or Shipper's/point operator's contact person is unavailable, Transporter shall not be responsible for any consequences that result from its subsequent actions taken to alleviate the system problem. Transporter, however, will make reasonable continuing efforts to notify the affected Shipper/point operator. In addition to the other information contemplated by this Section 13.5, such notice shall also include information about the status of operational variables that determine when an Operational Flow Order or Action Alert will begin and end, and Transporter shall post periodic updates of such information, promptly upon occurrence of any material change in the information. Transporter will post a notice on the EBB informing the Shipper/point operator when any Operational Flow Order or Action Alert in effect will be cancelled and specifying the factors that caused the Operational Flow Order or Action Alert to be issued and then lifted, to the extent such factors are known.
- 13.6 Action Alerts: In the event that, in Transporter's judgment, action is required to avoid a system integrity issue, Transporter may issue Action Alerts.
- (a) Issuance of Action Alerts: Action Alerts will be noticed in accord with the procedures set forth in Section 13.5 and will be issued a minimum of four hours, or such shorter period of time as Transporter deems reasonable under the circumstances, prior to the required action by the Shipper/point operator.
  - (b) Required Actions: Action Alerts can be issued to effect any of the following:
    - (i) curtailment of interruptible services;

- (ii) restrictions of receipts or deliveries at specific Receipt or Delivery Point(s) covered by an Operational Balancing Agreement to the aggregate MDQ under the firm Agreements whose Primary Receipt Points and/or Primary Delivery Points are at the affected locations;
- (iii) forced balancing such that point operators will be required to assure that nominations equal flows or that receipts and deliveries fall within the tolerance level designated in the Action Alert; and/or
- (iv) any action required to maintain the integrity of Transporter's System.

13.7 Operational Flow Orders: In the event that (1) Shipper/point operator does not respond to an Action Alert, or (2) the actions taken thereunder are insufficient to correct the system problem for which the Action Alert was issued, or (3) there is insufficient time to carry out the procedures with respect to Action Alerts, Transporter may periodically take unilateral action, including the curtailment of firm Transportation Service, to maintain the operational integrity of Transporter's system (or any portion thereof). For purposes of this Section 13.7, the operational integrity of Transporter's system shall encompass the integrity of the physical system and the preservation of physical assets and their performance, the overall operating performance of the entire physical system (or any portion thereof), and the maintenance (on a reliable and operationally sound basis) of total system deliverability and the quality of Gas delivered. Notice of an Operational Flow Order will be provided pursuant to and in accordance with Section 13.5 above.

13.8 Penalties: If a Shipper/point operator fails to comply with an Action Alert or Operational Flow Order, the Shipper/point operator shall be subject to a penalty as follows:

Action Alert penalty for each Dekatherm of Gas by which Shipper/point operator deviated from the requirements of the Action Alert equal to the product of 200% times the average Cashout price as determined pursuant to Section 8.7(a) of these General Terms and Conditions, for each Day that said Action Alert is in effect.

Operational Flow Order penalty for each Dekatherm of Gas by which Shipper/point operator deviated from the requirements of the Operational Flow Order equal to the higher economic value of (1) the product of 500% times the Cashout High Common price as determined pursuant to Section 8.7(a) of these General Terms and Conditions and each Dekatherm of Gas by which Shipper/point operator deviated from the requirements of the OFO and (2) the total economic value of any charges imposed or derived from the applicable interconnecting pipeline's OFO penalty rate that Adelpia is subject to, for each Day that said Operational Flow Order is in effect.

Any penalty revenues received by Transporter as a result of the operation of Section 13.8 above will be credited pursuant to Section 23.2 of the General Terms and Conditions.

- 13.9 Liability of Transporter: Transporter shall not be liable for any costs or damages incurred by any Shipper/point operator in complying with an Operational Flow Order. Transporter shall not be liable for any costs or damages that result from any interruption in Shipper's/point operator's service that is a result of a Shipper's/point operator's failure to comply promptly and fully with an Operational Flow Order. Shipper/point operator shall indemnify Transporter against any claims of liability, provided, however, that Transporter shall use reasonable efforts to minimize any such costs or damages.