

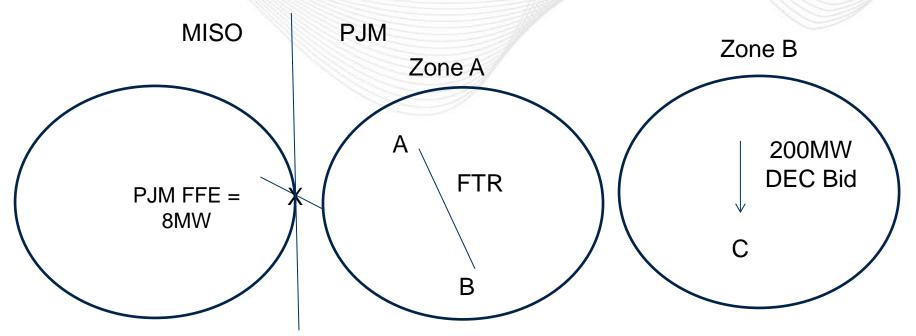
FTR Forfeitures

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Review: Illustrative Example



Step 3: Determine if DA Constraint X increases the FTR value from A-B (\$0.01)

Step 1: Determine if FTR Path is more congested DA vs. RT

Step 2: Determine impact on DA Constraint X from Virtual transaction (10% of limit)



- Convergence Test DA cLmp > RT cLMP for FTR path
 - Determines Hour where DA congestion is greater than RT along a path
- Virtual Test Net virtual activity across all affiliates must be greater than or equal to 10% of DA constraint limit
 - Determines Constraints virtual flow is significantly impacting
- <u>FTR Impact Test</u> (dfax*Shadow Price)FTR Sink (dfax*Shadow Price)FTR Source >= \$0.01
 - Determines FTR paths (direction accounted for counter flow)
- FTR Forfeiture DA Value FTR Cost



- KWA #2 Perform and review sensitivity analysis on the FTR Impact Test levels and others as required
- Sensitivity scenario performed by PJM to <u>adjust</u> FTR Impact trigger from greater than or equal to \$0.01 to greater or equal to net 10% distribution factor (per prior rule) for September 2017
 - Look at FTR flow impact across identified constraint, not constraint dollar impact to FTR path
- Concept: determine impact this specific trigger is having on forfeiture totals

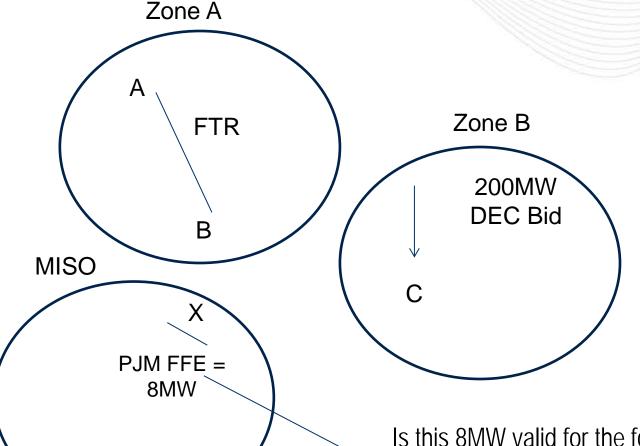


- Forfeiture dollars reduced by roughly 97% for the month of September 2017
- 67 FTR participants billed forfeitures under status quo
- 18 FTR participants billed forfeitures under sensitivity
- Conclusion: Majority of constraints "far away" from impacted FTRs in September 2017
 - Incomplete: high virtual MW activity can significantly impact from a distance (MW*Dfax)

| Test: | Total: | FTR Impact Test: | Virtual Test: | Impacted FTR Accounts |
|-------------|----------------|--|---|--------------------------|
| ACTUAL | \$2,001,261.29 | Greater than or equal to \$0.01 on FTR TGT Credit | greater of .1 MW or 10% of the line limit | 67 |
| SENSITIVITY | \$6,310.08 | FTR flows greater than or equal to 10% across constraint | greater of .1 MW or 10% of the line limit | 18 |



M2M Flowgate Virtual Test Hypothetical Example



- Virtual Test determines if Decrement Bid at point C significantly impacts flow gate X (DA constraint)
- "Significantly" is determined to be greater than or equal to 10% of DA binding limit
- 10% impact for this flow gate would be 0.8MWs or roughly 0.4% dfax given 200MW dec bid

Is this 8MW valid for the forfeiture calculation? Should it be something else for purposes of the forfeiture calculation?



 Continue analysis to look at market-to-market flowgates and better understand DA FFE values

Present findings at July MIC