

Regulation Market Pricing Issue

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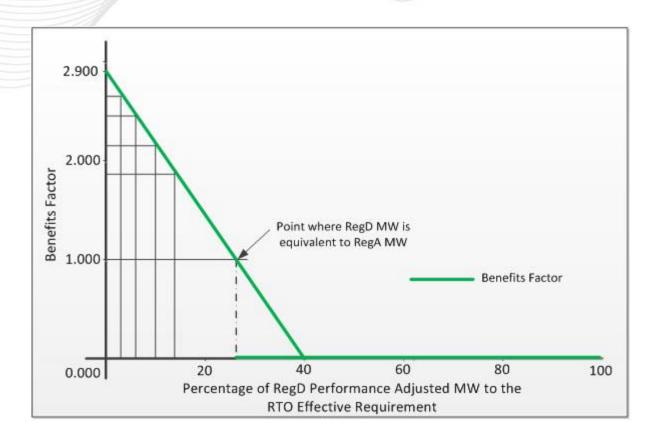


- Performance Based Regulation became effective October 1, 2012 and compensated resources based on:
 - Benefits Factor (BF)
 - Mileage
 - Performance Score (PS)
- OC Special Sessions Regulation Performance Impacts
 - Revised Benefits Factor curve and floored the RegD BF at 1 during excursion hours (Dec 2015)
- Regulation Market Issues Senior Task Force
 - Modified the regulation signal in January 2017 and subsequently removed the BF floor in August 2018 based on operational analysis
 - MRC endorsed the joint PJM/IMM package to use Marginal Rate of Technical Substitution (MRTS) instead of the BF in June 2017
 - Submitted a 205 filing that was rejected by FERC and the solution was never implemented



Review of Regulation Clearing

- Regulation resources are cleared in ASO 1 hour before the operating hour
 - Priced in LPC every 5 minutes
- Self-Scheduled and \$0 offers are cleared first, then remaining resources are cleared up to requirement in economic order
- RegD Benefits Factor ranges between 2.9 and 0.001
- RegA Benefits Factor = 1
- Performance score below 40% will not clear





Recent Regulation Clearing Price Spikes

 $\mathsf{RMCP} = \mathsf{Adj. Capability Offer} + \frac{\mathit{Capability Offer}}{\mathit{Benefits Factor} * \mathit{Performance Score}}$ $\mathsf{Adj. Performance Offer} + \frac{\mathit{Performance Offer} * \mathit{Mileage}}{\mathit{Benefits Factor} * \mathit{Performance Score}}$ $\mathsf{Adj. LOC} \qquad \frac{\mathit{LMP - Marginal Cost}}{\mathit{Benefits Factor} * \mathit{Performance Score}}$

Any offer or LOC will increase drastically if the BF or PS are very low values



Simplified Example

$$RMCP = \frac{Capability\ Offer}{Benefits\ Factor\ *Performance\ Score} = \frac{\$0/MWh}{0.001\ *\ 0.80} = \$0/MWh$$

$$\frac{Performance\ Offer\ *\ Mileage}{Benefits\ Factor\ *Performance\ Score} = \frac{\$0/MWh\ *\ 34.14}{0.001\ *\ 0.80} = \$0/MWh$$

$$\frac{LMP\ -Marginal\ Cost}{Benefits\ Factor\ *Performance\ Score} = \frac{\$15/MWh\ -\$10/MWh}{0.001\ *\ 0.80} = \frac{\$5/MWh}{0.0008} = \$6,250/MWh$$

Benefits Factor *Performance Score

Even with a \$0 offer, a difference of \$5 in LOC can create a \$6,250 Clearing Price



- All calculations are being done consistent with market rules
- RMISTF proposal would have addressed some settlement implications of this proposal <u>but not the actual price spikes</u>
- PJM plans to bring a Problem Statement and Issue Charge and a proposed solution to the September MRC for a first read and ask for a vote at the October MRC
 - Floor BF in market clearing at .1 instead of 0
 - Minor updates will required in M-11 and/or M-12



- Between May 1, 2018 and August 6, 2018 there were 105 intervals where the regulation market clearing price was above \$500/MWh
 - 43 of these hours had marginal benefits factors < .1 and they have been as low as
 0.000076 (>13,000 MW of RegD to provide 1 MW of RegA)
 - Posted/settled prices have exceeded \$7,000 for a 5-minute interval
 - The calculation is not bounded
- PJM proposes to set a low limit on the BF of .1 in the market clearing
- The proposed solution would limit the ratio to 10 MW of RegD to provide 1 MW of RegA
- This would have impacted only 2.5% of all hours in the last year