Potential impact of MOPR order on DR resources
(Updated for FERC April Rehearing Order)

DRS
6/11/2020
• Overview of MOPR order impact to DR
• MOPR Rehearing order impact to compliance filing
• Subsidies
• MOPR existing resource
• MOPR price structure
• DR process and MOPR order

This is a work in progress which will evolve and needs to be approved by FERC
This process determines the Daily Deficiency charges (penalty)
DR MOPR prices

- **GenDR**
  - New (netCONE) - $254
  - Existing (netACR) - $3
- **LoadDR**
  - New – weighted average offer from last 3 BRAs by LDA.
    - PJM to use Load DR amount from Pre-registrations tied to offers for calculation.
  - Existing – $0
GenDR breakdown (19/20 registrations) based on CSP reported capability
GenDR breakdown (19/20 registrations) based on CSP reported capability

### Count of LOCATION_ID

<table>
<thead>
<tr>
<th>Column Labels</th>
<th>Diesel</th>
<th>Gasoline</th>
<th>Natural Gas</th>
<th>None</th>
<th>Oil</th>
<th>Propane</th>
<th>Waste Products</th>
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<th>Grand Total</th>
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<tbody>
<tr>
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<tr>
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<td></td>
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<td></td>
<td>7</td>
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<td></td>
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<tr>
<td>Grand Total</td>
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<td>7</td>
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<td>1</td>
<td>9</td>
<td></td>
<td>16</td>
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#### Sum of MAX_OUTPUT KW

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<tr>
<th>Column Labels</th>
<th>Diesel</th>
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<th>Natural Gas</th>
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<th>Oil</th>
<th>Propane</th>
<th>Waste Products</th>
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<th>Grand Total</th>
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<tbody>
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<tr>
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<td>7,000</td>
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<td>Grand Total</td>
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<td>35</td>
<td>302</td>
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<td>28,695</td>
<td>1,923,687</td>
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</table>

2,033 units are Gas or Diesel engines

Priorities: 1) RICE – Diesel, 2) RICE – Gas, 3) CT – Gas, 4) Cogen/Steam - Gas
MOPR rehearing Order
key impacts to DR compliance filing

- (No Change) 265 Track MOPR by location not by “resource”.
- (Change) 172, 398 Track MOPR status by Location by MW, as needed
  - Uprate MW = Nominated MW in excess of Existing MW (exempt or nonexempt)
  - Subsidized Uprate MW will be subject to MOPR if location made investment to increase the load reduction capability to participate in the PJM capacity market
    - For example, a location invests in new BTMG in order to participate in Capacity Market with additional MWs.
  - PJM intends to only allow 1 location on a registration to be able to administer nominated MW.
- (Change) Existing location that is not Pre-Registered with cleared RPM resource for 1 DY will go back to New status with netCONE price (NOT remain existing)
• (Change) 400 Bilateral transaction impact (discussed at MIC)
• (No change) 259 DR can use Competitive Exemption
• (No change) 187-189, 193 Gen DR – BTMG that is used to reduce load.
  – MOPR price is same as front of the meter generator and does not include avoided cost
  – Avoided cost may be included in unit specific review
• (No change) 266 – DR is not required to contract with all customers prior to offering into the auction.
A direct or indirect payment, concession, rebate, subsidy, non-bypassable consumer charge, or other financial benefit that is (1) a result of any action, mandated process, or sponsored process of a state government, a political subdivision or agency of a state, or an electric cooperative formed pursuant to state law, and that (2) is derived from or connected to the procurement of (a) electricity or electric generation capacity sold at wholesale in interstate commerce, or (b) an attribute of the generation process for electricity or electric generation capacity sold at wholesale in interstate commerce, or (3) will support the construction, development, or operation of a new or existing capacity resource, or (4) could have the effect of allowing a resource to clear in any PJM capacity auction.
• Process is being developed and should be available in July.
Existing Process - Resource => Registration => Location

- **Resource** (Zone, RPM/FRR commitment = 3 MW)
  - Joe CSP, PSEG zone, 3 MW ICap
- **Registration** (Term, Capacity nomination = 4.5 MW)
  - Acme, Elizabeth, 3 MW ICap
  - Acme, 0.5 MW
  - School 51, 1 MW
- **Location** (EDC acct, physical address, DR capability = 6 MW)
  - Acme, Elizabeth1, 3 MW capability
  - Acme, Elizabeth2, 1 MW capability
  - Acme, Roselle, 1 MW
  - Acme, Roselle, 1 MW
  - School 51, 1 MW

DR capability – can be used to prorate nomination

- GenDR – Diesel 2 MW
- LoadDR – HVAC 1 MW

LoadDR – HVAC 1 MW
Current DR Existing vs Planned process for CREDIT

• CSP submits DR plan for “new” and “existing” resources
  – Existing resources criteria (currently registered and expect to be registered for future DY):
    • BRA (may) – Newer CSP (greater of DY and DY+1 MW)
    • 1rst IA (sep) – current DY CSP (greater of DY and DY-1 MW)
    • 2nd IA (jul) – current DY CSP (greater of DY and DY-1 MW)
    • 3rd IA (feb)– Newer CSP (newer of DY and DY+1 MW)
  – Planned/New resource – Load reduction capability currently not registered
• CSP offers DR MWs into auction for typically 1 resource for each zone/LDA
  – When we had multiple products, a resource was created for each product
    • CSP would have multiple resources per zone
MOPR impact on Registration & Pre-Registration process

- CSP allocates registration Nominated capacity to LoadDR
- CSP views MOPR status & verifies Subsidy status
- PJM MOPR status registry
  - EDC Account number changes
  - MOPR rule violation – ban
  - CSP “old” registration exception
- CSP links registrations to DR resource based on MOPR/Subsidy status
Exempt status
(managed in DR Hub)

- Exempt
  - Maximum nominated Icap for Location* that was registered for one of the following DYs:
    - 14/15 through 19/20, or
      - Location registered before 14/15 will still qualify as exempt if CSP provides PJM with supporting documentation
    - 20/21 to support MWs cleared in BRA/1rstIA/2ndIA, or
    - 21/22 to support MWs cleared in BRA/1rstIA
      - PJM may need to develop an interim process to allow CSPs to register early for 21/22 depending on timing of BRA.
  - For Exempt Locations: Future Nominated ICap > Exempt Nominated ICap is exempt if CSP certifies that no investment was made to increase the load reduction capability in the capacity market.
    - For example - PLC increase, expanded load at facility but same process to reduce, etc.
  - *PJM will track by EDC account number, CSP to report any EDC account number changes.
  - *Registration nominated Icap will be prorated to locations on aggregate registration based on proportion of Location’s load reduction capability.
  - *Mass market utility programs will be based on maximum number of locations previously registered.

“Existing” for credit will be different than Existing for MOPR
MOPR order and hypothetical early registration process

- PJM may need to implement an early registration process so CSPs can identify Locations (never previously registered by any CSP) used to support ’21/22 Capacity commitments from the BRA or 1rst IA so they are Exempt from MOPR.

1/15/21
BRA

12/1/20
DR Plan deadline

If BRA is in March we may do normal Registration process

11/1-11/15/20
Early Registration
(21/22 DY)

Work in Progress
“new” locations under contract only, estimated PLC, limited EDC review
MOPR status administration
(Pre-Registration process for Auctions)

- **New**
  - Location Pre-Registered for DY and was not previously linked (through Pre-Registration process) to RPM cleared resource or “Existing” reclassified as “New” if did not offer in subsequent BRA.
  - Nominated kW in DY > Nominated kW in DY-1 and CSP made investment to increase load reduction capability to participate in capacity market
    - Only subject to MOPR if there is a subsidy

- **Existing**
  - (Change from new to existing) Location Pre-Registered for DY-1 that did not claim competitive exemption (or clear above netCONE) and linked (through Pre-Registration process) to RPM cleared resource
  - (maintain existing) Existing in DY and Location Pre-registered for DY+1 and associated with offered RPM resource.
    - Once you are existing, you maintain existing status as long as location is offered in the BRA.
    - If location is not offered in DY+1 BRA, the location will revert back to New status (for DY+1 and all future DYs)
      - For example, a resource not offered in the 2023/2024 BRA will lose the Existing status for all MW for the 2023/2024 DY and beyond.
        » Existing status will be retained in the 2022/2023 1st, 2nd or 3rd Incremental Auctions.
  - For Existing Locations: Future Nominated ICap > Existing Nominated ICap is Existing if CSP certifies that no investment was made to increase the load reduction capability in the capacity market.

- PJM will make Location status (Exempt, New, Existing) transparent to CSP for Pre-Registration process
Subsidy Status administration

- Manage ~120 days before the auction
  - Subsidy – Unit Specific Exemption
- Manage during Pre-Registration process for each auction
  - No Subsidy
  - Subsidy – Competitive Exemption
  - Subsidy
- Within 5 days of subsidy effective date
  - Subsidy
- Banned New/Existing – if previously designated as No Subsidy (or Competitive Exemption) but then takes the Subsidy for the DY or prior DY. Location is banned through DYx.
- Reference back to tariff definitions
  - Cleared Capacity Resource with State Subsidy: MOPR Status = Existing, Subsidy Status = Subsidy or Subsidy – Competitive Exemption
  - New Entry Capacity Resource: MOPR Status = New, Subsidy Status = Subsidy or Subsidy – Competitive Exemption

5 different statuses
Competitive exemption allows a location that receives a subsidy to forgo the subsidy and therefore not be subject to MOPR.

Track by Location by kW during Pre-Registration process & compare to prior Pre-Registration status:
- If location elects Competitive exemption (forgo subsidy) OR indicates that location is NOT eligible for subsidy and clears capacity and then subsequently receives a subsidy then:
  - Existing location is not allowed to receive capacity revenue for entire DY
    - Unless it could demonstrate under the Unit-Specific Exemption that it would have cleared in the relevant auction
  - New location kW is banned from market for default asset life (“20 years”)
MOPR violation examples

• New, Ban for 20 years, forfeit revenue (DY1 plus any future DY commitments)
  – Pre-Registered: Location A, New – No subsidy (or Subsidy with Competitive Exemption) – clears in DY1
  – Pre-Registered: Location A – CSP verifies subsidy received in DY1, (or prior DY), Banned for 20 years, forfeit revenue

• Existing, forfeit revenue (DY2)
  – Pre-Registered DY1: Location A, New – No subsidy or clears at netCONE – clears in DY1
  – Pre-Registered DY2: Location A, Existing – No subsidy (Subsidy with Competitive Exemption) – clears in DY2
  – Pre-Registered: Location A, Existing – CSP verifies subsidy received in DY2, Forfeit Revenue
# Use Cases – Status Changes

Location (no subsidy) switches from New to Existing and back to New because it did not pre-register for BRA.

<table>
<thead>
<tr>
<th>Registration Process 1</th>
<th>Auction Process</th>
<th>Location (no subsidy) switches from New to Existing and back to New because it did not pre-register for BRA.</th>
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</thead>
<tbody>
<tr>
<td><strong>CSP</strong></td>
<td><strong>Registrations</strong></td>
<td><strong>Linked to cleared resource</strong></td>
</tr>
<tr>
<td>JoeCo</td>
<td>Registration</td>
<td>Location</td>
</tr>
<tr>
<td>1</td>
<td>B</td>
<td>22/23</td>
</tr>
<tr>
<td>SueCo</td>
<td>2</td>
<td>B</td>
</tr>
<tr>
<td>SueCo</td>
<td>3</td>
<td>B</td>
</tr>
<tr>
<td>SueCo</td>
<td>4</td>
<td>B</td>
</tr>
<tr>
<td>SueCo</td>
<td>5</td>
<td>B</td>
</tr>
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</table>

Location (subsidy) switches from New to Existing and back to New because it did not pre-register for BRA.

<table>
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<th>Registration Process 2</th>
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<th>Location (subsidy) switches from New to Existing and back to New because it did not pre-register for BRA.</th>
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<td><strong>CSP</strong></td>
<td><strong>Registrations</strong></td>
<td><strong>Linked to cleared resource</strong></td>
</tr>
<tr>
<td>JoeCo</td>
<td>Registration</td>
<td>Location</td>
</tr>
<tr>
<td>1</td>
<td>B</td>
<td>22/23</td>
</tr>
<tr>
<td>SueCo</td>
<td>2</td>
<td>B</td>
</tr>
<tr>
<td>SueCo</td>
<td>4</td>
<td>B</td>
</tr>
<tr>
<td>SueCo</td>
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<tr>
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### Use Cases – Status Changes

**Registration Process 3**

<table>
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<th>Subsidy Status</th>
<th>Resource Type</th>
<th>Resource Cleared</th>
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<tbody>
<tr>
<td>JoeCo</td>
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<td>22/23</td>
<td>3 Y</td>
<td></td>
<td></td>
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<td>25/26</td>
<td>3</td>
<td>New</td>
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<td>NonMOPR</td>
<td></td>
<td>Y</td>
</tr>
<tr>
<td>SueCo</td>
<td>2 B</td>
<td>23/24</td>
<td>3 Y</td>
<td></td>
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<td>BRA</td>
<td>26/27</td>
<td>3</td>
<td>Bann4Life</td>
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<td>MOPR</td>
<td>Sub: DY</td>
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*Location indicates no subsidy or competitive exemption as New but then take subsidy for same DY or prior DY.*

**Registration Process 4**

<table>
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<th>Location</th>
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<th>NomMW</th>
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<th>Auction Process</th>
<th>Auction</th>
<th>DY</th>
<th>MW</th>
<th>MOPR Status</th>
<th>Subsidy Status</th>
<th>Resource Type</th>
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<tbody>
<tr>
<td>JoeCo</td>
<td>1 B</td>
<td>22/23</td>
<td>3 Y</td>
<td></td>
<td></td>
<td>BRA</td>
<td>25/26</td>
<td>3</td>
<td>New</td>
<td>NoSub</td>
<td>NonMOPR</td>
<td></td>
<td>Y</td>
</tr>
<tr>
<td>SueCo</td>
<td>2 B</td>
<td>23/24</td>
<td>3 Y</td>
<td></td>
<td></td>
<td>BRA</td>
<td>26/27</td>
<td>3</td>
<td>Existing</td>
<td>NoSub</td>
<td>NonMOPR</td>
<td></td>
<td>Y</td>
</tr>
<tr>
<td>SueCo</td>
<td>3 B</td>
<td>24/25</td>
<td>3 Y</td>
<td></td>
<td></td>
<td>BRA</td>
<td>27/28</td>
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<td>Forfeit Rev Sub</td>
<td>MOPR</td>
<td></td>
<td>N, but offered</td>
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</table>

*Location indicates no subsidy or competitive exemption as New, changes to existing but then takes subsidy for same DY or prior DY.*
GenDR vs LoadDR – CSP to allocate on registration (expect only 1 location per registration)

- PJM to provide registration default allocation based on CSP reported GenDR vs LoadDR location load reduction method %.
- CSP can adjust default allocation to improve accuracy, as needed
- Allocation will be used for MOPR amount and LoadDR MOPR price calculation

<table>
<thead>
<tr>
<th></th>
<th>LoadDR %</th>
<th>GenDR%</th>
<th>LoadDR kW</th>
<th>GenDR kW</th>
</tr>
</thead>
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<tr>
<td>Summer kW</td>
<td>75%</td>
<td>25%</td>
<td>2,068</td>
<td>689</td>
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<tr>
<td>Winter kW</td>
<td>75%</td>
<td>25%</td>
<td>274</td>
<td>91</td>
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<table>
<thead>
<tr>
<th>Capacity</th>
<th>LoadDR kW</th>
<th>GenDR kW</th>
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<tbody>
<tr>
<td>Peak Load Contribution (kW)</td>
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<td>Measurement Method</td>
<td>Pirm Service Level</td>
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<td>Summer Managed Load (kW)</td>
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<tr>
<td>Capacity Loss Factor</td>
<td>1.0397</td>
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<tr>
<td>Summer Nomeated ICAP (kW)</td>
<td>2756.892</td>
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</table>

<table>
<thead>
<tr>
<th>Resource Type</th>
<th>Pre-Emergency</th>
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<tbody>
<tr>
<td>Product</td>
<td>Capacity Performance DR</td>
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<tr>
<td>RPM DR Resource</td>
<td>ENOC PECO DR</td>
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<td>Lead Time</td>
<td>Quick_30</td>
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<td>Use Case</td>
<td>CSP</td>
</tr>
<tr>
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</tr>
<tr>
<td>Exempt, No Sub</td>
<td>Joe CSP</td>
</tr>
<tr>
<td>Exempt, Sub</td>
<td>Joe CSP</td>
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<tr>
<td>Exempt, uprate, invest, NoSub</td>
<td>Joe CSP</td>
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<tr>
<td>Exempt, no invest, Sub</td>
<td>Joe CSP</td>
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<tr>
<td>Sub, New</td>
<td>Joe CSP</td>
</tr>
<tr>
<td>Sub, Exist</td>
<td>Joe CSP</td>
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</tbody>
</table>

Notes:
- GenDR and LoadDR amount default (by season by uprate or non-uprate) is based on Location DR load reduction capability. CSP may override if there is more accurate information.
- Exempt MW is based on max nominated Icap in past 6 DY and may increase if no investment. Residential locations based on max # of customers in program over prior 6 years.
- Exempt/Existing NomICap based on Summer Nom ICap.
- Subsidy status = Subsidy, No Subsidy, Subsidy-CompetitiveExempt, Subsidy-UnitSpecExempt
- MOPR status = Exempt, New, Existing, Banned
- An uprate is defined as increased MW beyond the exempt amount when uprate does requires an investment.
- Uprate will be based on DY2>DY1 for summer nomination.
- New changes to existing if cleared in auction for prior auction DY (this also include uprate vs non-uprate kw)
Registration to DR Resource rules  
(work in progress)

<table>
<thead>
<tr>
<th>Subsidized Registrations by Type</th>
<th>DR Resource</th>
<th>DR Resource Type</th>
<th>MOPR Price</th>
<th>GrossCo/ACR</th>
<th>Est NetCone/ACR</th>
<th>Cleared Price</th>
<th>Cleared MW</th>
<th>Registration type that can be linked</th>
<th>Sum of Nominated Icap</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>LoadDR</td>
<td>(Exempt + No Sub - New/Exist), GenDR (Exempt + No Sub - New/Exist)</td>
<td>none</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>LoadDR (Exempt + No Sub - New/Exist), GenDR (Exempt + No Sub - New/Exist)</td>
<td>120</td>
<td>20</td>
</tr>
<tr>
<td>2</td>
<td>LoadDR New (Sub)</td>
<td>netCone</td>
<td>$65</td>
<td>$65</td>
<td>$120</td>
<td>4</td>
<td>LoadDR New (Sub)</td>
<td>0</td>
<td>-4</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>LoadDR Existing(Sub)</td>
<td>netACR</td>
<td>$0</td>
<td>$0</td>
<td>$120</td>
<td>2</td>
<td>LoadDR Existing(Sub)</td>
<td>3</td>
<td>1</td>
<td></td>
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<tr>
<td>4</td>
<td>GenDR New (sub)</td>
<td>netCONE</td>
<td>$254</td>
<td>$254</td>
<td>$120</td>
<td>3</td>
<td>GenDR New (sub)</td>
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<tr>
<td>5</td>
<td>GenDR Existing (sub)</td>
<td>netACR</td>
<td>$3</td>
<td>$3</td>
<td>$120</td>
<td>2</td>
<td>GenDR Existing (sub)</td>
<td>0</td>
<td>-2</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>GenDR unit specific_Gen123</td>
<td>X</td>
<td>$254</td>
<td>$100</td>
<td>$120</td>
<td>1</td>
<td>GenDR unit specific_Gen123</td>
<td>0</td>
<td>-1</td>
<td></td>
</tr>
</tbody>
</table>

Replacement transaction may be used to cover positions if same PJM organization.
Unit Specific Exemption

- see separate slide deck
• Commercial
  – Time/MW weighted average MOPR price

\[
\text{MOPR Price} = \frac{((\text{Solar Summer MW} \times \text{MOPR Price}) \ + \ (\text{Gen DR Summer MW} \times \text{MOPR Price}) \ + \ (\text{WF Summer MW} \times \text{MOPR Price}))}{\text{Total Summer MW}} \times \frac{\text{Days in Summer}}{\text{Days in DY}} + \frac{((\text{Winter Summer MW} \times \text{MOPR Price}) \ + \ (\text{Gen DR Winter MW} \times \text{MOPR Price}) \ + \ (\text{WF Winter MW} \times \text{MOPR Price}))}{\text{Total Winter MW}} \times \frac{\text{Days in Winter}}{\text{Days in DY}}
\]

Or
\[
\frac{((30 \times 290) + (2 \times 254) + (4 \times 0))}{36} \times \frac{184}{365} + \frac{((2 \times 290) + (1 \times 254) + (33 \times 0))}{36} \times \frac{181}{365} = \$140.43/\text{MW-Day}
\]

• Facilitated
  – Annual MOPR price used for Summer or CP DR