

PJM Proposal

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PJM EPFSTF Proposal

- Consolidate Tier 1/Tier 2
 - One product. Uniform compensation, obligation, and penalty.
 - Enhance must offer for reserves
- More Flexible Reserve Zone Modeling
 - Use regional model that exists today
 - Predefine additional regions
- Operating Reserve Demand Curve Enhancements (ORDC)
 - Base reserve value beyond the minimum requirement on statistical representation of uncertainty

Open Issues Impacting Price Formation

• EPFSTF

- Primary focus to date has been on reserve market design
- Variable Operations & Maintenance
 - Include maintenance in cost-based offers
 - Passed at the 9/27/18 MRC but failed at the MC
- Transmission Constraint Penalty Factors
 - Remove constraint relaxation
 - Passed at the October Members Committee
- Fast-start Pricing
 - Pending at FERC

Principles of PJM's Proposal

Goals of PJM's Proposal

- 1. Reserve and energy prices reflect system conditions and appropriately value scarcity
- 2. ORDCs reflect the reliability value of reserves
- 3. Reserve capability is accurately measured
- 4. Resource will provide reserves when deployed
- 5. Market power is mitigated
- 6. Social welfare is maximized

JM 1. Reserve and energy prices reflect system conditions and appropriately value scarcity

- Prices are co-optimized so that energy and reserve prices are consistent with each other given system conditions
- More dynamic reserve zone model will help to better align reserve prices with actual system constraints
- Consolidation of Tier1/Tier2 will improve reserve measurement accuracy leading to prices more closely aligned with actual system conditions
- Current proposal relies on the assumption that an \$850/MWh penalty factor accurately values scarcity
- PJM does not believe this is the case
 - \$850/MWh penalty factors will cap prices below the cost of actions operators will take to maintain reserves
 - \$850/MWh penalty factors will result in economic shortages and false positives for shortage pricing
- Discussion of this topic has been deferred to the mid-term



2. ORDCs reflect the reliability value of reserves

- Downward sloping portion of the curve relates system uncertainty with reserve value
- PJM believes this directly connects the level of reserves with a statistical measure of reliability
- Current proposal relies on the assumption that \$850/MWh reflects the reliability value of reserves
- \$850/MWh penalty factors may not reflect the cost of operator actions taken to maintain reserves
- PJM believes the \$850/MWh needs to be increase



PJM Perspective on this Issue

PJM understands the concerns regarding committing reserves at the level the PJM proposal.

- 1. The exact amount of reserves needed is not known.
 - Our goal is to procure enough on-average to ensure we meet the MRR given the uncertainty we've modeled.
 - This will result in PJM procuring more reserves than it does today. This is a solution, not a problem.
- 2. The current approach is not the benchmark.
 - We're discussing enhancements to the status quo. Using it to measure the effectiveness of proposals and make decisions can be misleading.
- 3. Operators will not operate the system at the edge.
 - Current markets assume the system can operate without a safety margin. This is not realistic.
 - Currently this is managed with manual operator actions rather than a systematic method. These actions may suppress price.



- Remove Tier 1 reserves which create significant uncertainty
- Utilize energy offer parameters to determine reserve capability wherever possible
- More flexible reserve zone modeling will better identify reserves that are behind transmission constraints and cannot be used



- All resources committed are compensated equally and have an obligation to respond
- Non-compliance for any resource committed for reserves will be penalized

- PJM is also working to ensure move its reserve deployment mechanism into generator basepoints
 - Clear communication of expectation
 - Enhance pricing around reserve events



5. Market power is mitigated

- No changes to impact this
 - Synchronized Reserve market remains cost-based
 - Non-Synchronized Reserve market has \$0/MWh offers
- 2nd Quarter 2018 State of the Market Report indicates the Synchronized Reserve market results were competitive



Other Items

<u>Short-Term (Q3 2018):</u>

- Synchronized Reserve (SR) Market
 - -Consolidation



- Offers
- Dynamic Reserve Zone Modeling (nodal)
- E&AS Offset Transition
- Simplified Operating Reserve Demand Curve (ORDC) Enhancements
- Fast-Start Pricing*
- Others??
- * Implementation dependent on FERC process and approval/rejection.

Mid-Term (Q1 2019):

- 30-Minute Reserve Market
- Complete ORDC Modeling (top end)
- Fast-Start Pricing*
- Others??

Long-Term (TRD)

- Broader ELMP implementation
- Day-ahead Reserve Modeling and Shortage Pricing (10 and 30-minute)
- Others??

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