UTC Review and Recommendations

MIC meeting on UTCs April 10, 2014 Howard J Haas



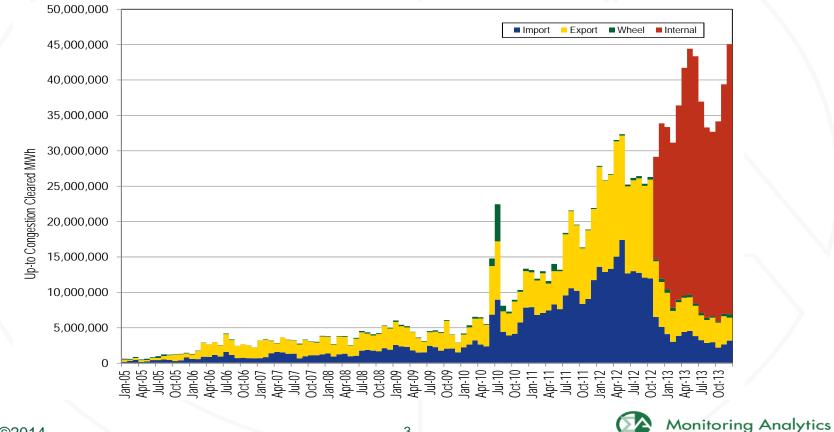
UTC: Premature to expand the product

- No evidence that the current rules regarding allowed node set and price spread are preventing effective use of the product
- Evidence that product is having an effect on the system
 - Unit Commitment and dispatch
 - Congestion
 - FTR revenues
 - Day ahead market solution issues





PJM cleared up-to congestion transactions by type (MW): 2005 through 2013



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3

UTC: Premature to expand the product

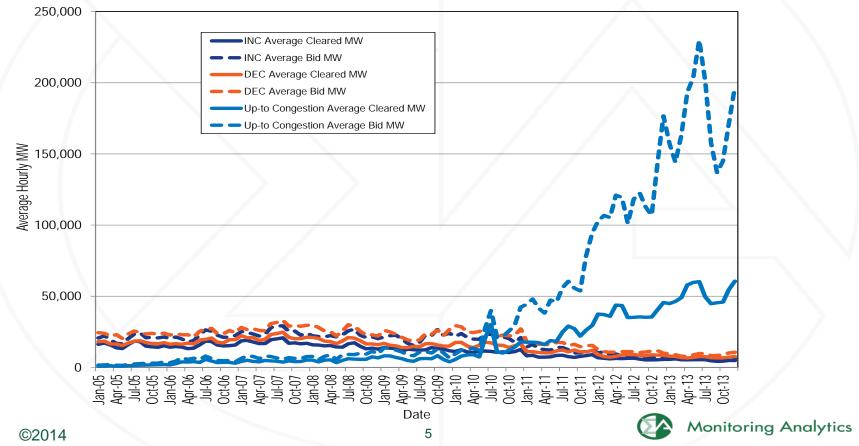
 Evidence that UTC are displacing the use of other products due to preferential treatment

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Hourly volume of bid and cleared INC, DEC and Up-to Congestion bids (MW) by month: 2005 through 2013



UTC: Premature to expand the product

- Product definition needs to include an allocation of uplift charges consistent with treatment of INCs and DECs
- FTR forfeiture rule needs inform application to all virtual bids and offers

6

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UTC Analysis: May Study

- PJM performed a study of market results with and without UTC bids using PJM's Day Ahead ALSTOM SPD program and its day ahead commitment practices, for five days in May (May 2, 4, 22, 23 and 27).
- The IMM used the data from PJM's May Study to examine the impact of UTCs on PJM markets.
- The IMM examined the impacts of UTCs on unit dispatch, unit commitment, day ahead and real time LMP convergence, day ahead congestion, balancing congestion and FTR funding.

UTC Analysis: December Study

- PJM performed a study of market results with and without UTC bids and with and without INCs and DECs using PJM's Day Ahead RSC and PROBE program for four days (December 10, 14, 18 and 23).
- Both PJM and the IMM used the data from PJM's December Study to examine the impact of UTCs and INCs and DECs on unit dispatch and unit commitment.

8



UTC Analysis: Impact on unit commitment

- PJM and the IMM agree that the data from the May and December studies indicated that UTCs affect unit commitment and dispatch in the day ahead market.
- PJM and the IMM agree that the data from the December study indicated that INCs and DECs affect unit commitment and dispatch in the day ahead market.
- PJM and the IMM agree that the magnitude of the impact on unit commitment status and unit output varies by day.

9





- PJM and the IMM agree that due to their effect on unit commitment and dispatch, UTCs should pay operating reserve charges
- The IMM position is that UTCs should pay operating reserve charges consistent with charges paid by INCs and DECs.
- PJM and the IMM recommend that the EMU process continue to review the appropriate level and allocation of operating reserve charges.





- The IMM recommends that UTCs be allocated uplift charges immediately, consistent with the treatment of INCs and DECs, pending further changes approved in the stakeholder process.
 - UTCs, like INCs and DECs, affect unit commitment, unit dispatch, uplift charges, LMP, congestion and FTR revenue adequacy.
 - UTC are currently provided preferential treatment relative to INCs and DECs.





- IMM calculated the impact of allocating uplift to UTCs (using same rules as for INCs and DECs) accounting for the impact of such payments on the profitability of the transactions
 - In 2013, 55.4 percent of all up-to congestion transactions were profitable.
 - Assumed that up-to congestion transactions would have maintained the same shares of profitable and unprofitable transactions with charges applied
 - 46.7 percent of all up-to congestion transactions would have been made





- Up-to congestion transactions would have paid an average rate between \$1.013 and \$2.680 per MWh in 2013 if charged in a manner consistent with INCs and DECs allocations.
- Rates would go down for all other transaction types

13





			Proposed Rates	Change	Change
	Transaction	(\$/MWh)	(\$/MWh)	(\$/MWh)	(%)
	INC	3.198	1.308	(1.890)	(59.1%)
	DEC	3.301	1.372	(1.929)	(58.4%)
East	DA Load	0.103	0.064	(0.039)	(38.3%)
	RT Load	0.073	0.073	(0.000)	(0.0%)
	Deviation	3.198	1.308	(1.890)	(59.1%)
	INC	1.561	0.475	(1.086)	(69.6%)
	DEC	1.664	0.538	(1.126)	(67.7%)
West	DA Load	0.103	0.064	(0.039)	(38.3%)
	RT Load	0.053	0.053	(0.000)	(0.0%)
	Deviation	1.561	0.475	(1.086)	(69.6%)
	East to East	NA	2.680		
UTC	West to West	NA	1.013		
	East to/from West	NA	1.846		

14



UTC Analysis: Uplift charges after applying uplift related recommendations in 2014 SOM

- IMM calculated the impact of allocating uplift to UTCs accounting for the impact of such payments on the profitability of the transactions, using all of the 2014 SOM uplift related recommendations
 - Assumed that up-to congestion transactions would have maintained the same shares of profitable and unprofitable transactions with charges applied
 - With identified uplift determination and allocation reforms, 66.7 percent of all up-to congestion transactions would have been made





Uplift Charges after Proposed Reforms: 2013

		Current Rates Pro	•	Change	Change
	Transaction	(\$/MWh)	(\$/MWh)	(\$/MWh)	(%)
	INC	3.198	0.176	(3.022)	(94.5%)
	DEC	3.301	0.202	(3.099)	(93.9%)
East	DA Load	0.103	0.026	(0.077)	(74.6%)
	RT Load	0.073	0.057	(0.016)	(22.5%)
	Deviation	3.198	0.176	(3.022)	(94.5%)
	INC	1.561	0.125	(1.436)	(92.0%)
	DEC	1.664	0.151	(1.513)	(90.9%)
West	DA Load	0.103	0.026	(0.077)	(74.6%)
	RT Load	0.053	0.036	(0.016)	(31.4%)
	Deviation	1.561	0.125	(1.436)	(92.0%)
	East to East	NA	0.377		
UTC	West to West	NA	0.276		
	East to/from West	NA	0.327		

16

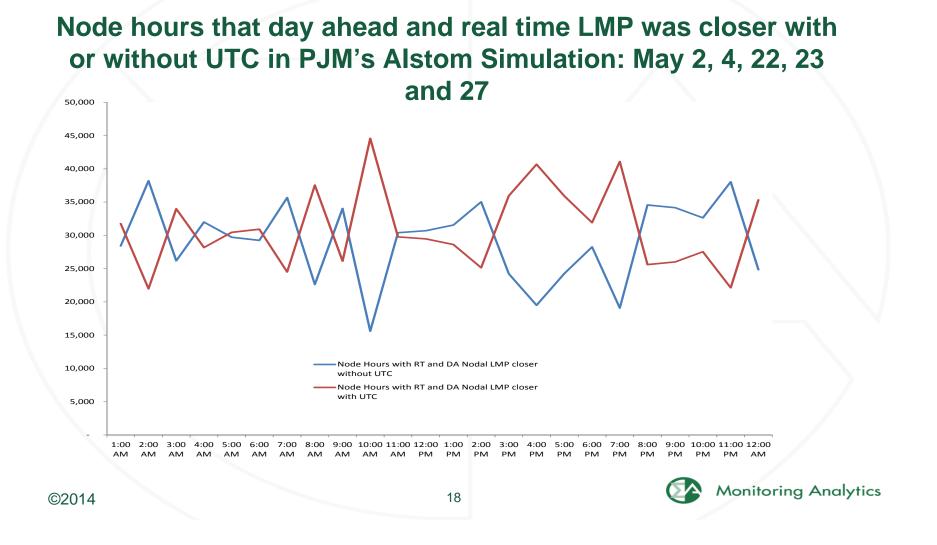


May UTC Analysis: Impact on price convergence

- Study results show that UTCs affected LMP through impacts on dispatch and unit commitment.
- Study results show no evidence to support the claim that UTCs contributed to overall day ahead and real time price convergence.
- Study results show that the impact of UTCs on day ahead and real time LMP differences varied by pricing node, by hour and by day, in both magnitude and direction.







UTC Arbitrage versus Point Specific Arbitrage

				LMP	[LMP
	Bus A		D	ifference	Di	fference
	LMP	LMP		(A-B)		(B-A)
DA Market	\$ 100.00	\$ 90.00	\$	10.00	\$	(10.00)
RT Market	\$ 110.00	\$ 95.00	\$	15.00	\$	(15.00)
	DEC = -	INC = +				
MW	-1	1				
Day Ahead Revenues	\$ (100.00)	\$ 90.00				
Real Time Revenues	\$ 110.00	\$ (95.00)		Total		
Net revenues	\$ 10.00	\$ (5.00)	\$	5.00		

19



UTC Profitability by source and sink bus: 2012 and 2013

			UTC	UTC			
			Profitable	Profitable			
	Cleared UTC	Profitable	at Source	at Sink	Profitable	Profitable	Profitable
Year	Bids	UTC Bid	Bus	Bus	UTC	Source	Sink
Year 2012	Bids 9,053,260			Bus 3,567,325	UTC 54.2%	Source 62.2%	Sink 39.4%



UTC Profitability and Modeled Divergence by Source and Sink Point by Hour: PJM results May 2, 22, 23 and 27

				Source					Source	Sink
		UTC	UTC	LMP					LMP	LMP
		Profitable	Profitable	Diverge	Sink LMP				Diverge	Diverge
	Profitable	at Source	at Sink	with UTC	Diverge with	Profitable	Profitable	Profitable	with UTC	with UTC
Cleared UTC Bids	UTC Bids	Bus	Bus	Bid	UTC Bid	UTC	Source	Sink	Bid	Bid
201,867	118,339	151,596	55,533	87,333	91,890	58.6%	75.1%	27.5%	43.5%	45.5%

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21

May UTC Analysis: Impact on congestion

- Study results show that UTCs significantly increased day ahead congestion.
 - UTCs increased the number of constraints that bind in the day ahead market.
 - UTCs affected the hours that the constraints bind.
 - UTCs affected the shadow prices of the constraints in the day ahead market.







May UTC Analysis: Impact on congestion

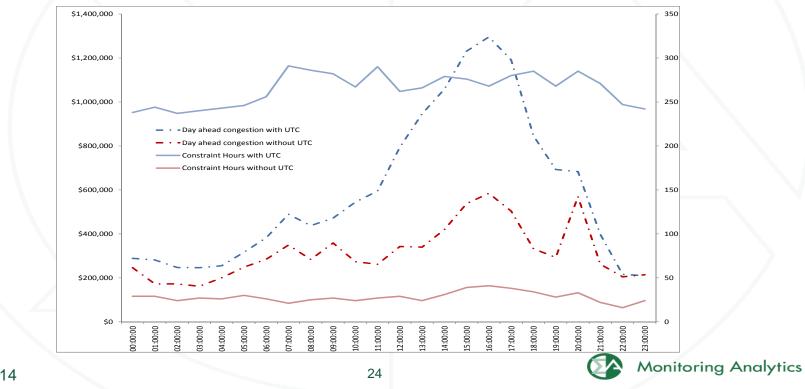
- Study results show that UTCs increase negative balancing congestion.
 - Removing UTCs reduced the number of day ahead constraints and day ahead congestion.
 - Removing UTCs made day ahead results more consistent with real time constraints and real time congestion.
 - Removing UTCs reduced negative balancing congestion.





UTC Analysis: Impact on congestion

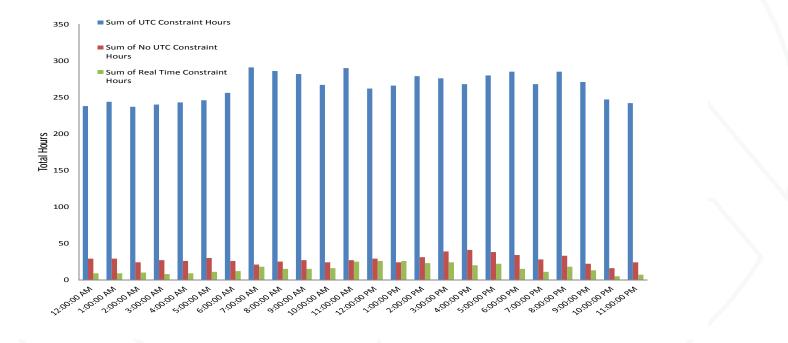
• Total day ahead congestion and number of day ahead binding constraints by hour, with and without UTC: May 2, 4, 22, 23 and 27



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UTC Analysis: Impact on congestion

• Comparison of total constraint hours by hour day ahead with and without UTC and real time: May 2, 4, 23, 24, 27



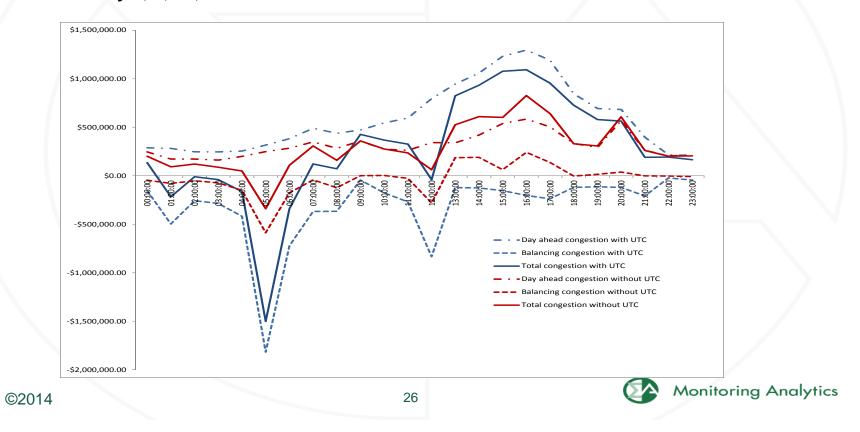
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25



UTC Analysis: Impact on congestion

• Total day ahead congestion and total balancing congestion by hour, with and without UTC: May 2, 4, 22, 23 and 27



UTC Analysis: FTR Funding

- Study results show that UTCs contributed significantly to FTR underfunding relative to target allocations.
- For the five days studied, the removal of UTCs changed FTR funding relative to target allocations from a deficit of -\$4.1 million to a net surplus of \$537 thousand, a gain in funding relative to target allocations of \$4.7 million.
- For the five days studied, removing UTCs reduced target allocations from \$16,241,505 to \$7,780,223. The reduction was \$8,461,282, or 52 percent.





UTC Analysis: Target Allocations

			Difference in	Change in
	Actual Target	No UTC Target	Target	Target
Date	Allocations	Allocations	Allocations	Allocations
2-May-13	\$ 1,361,463.96	\$ 1,060,874.04	\$ (300,589.92)	-22%
4-May-13	\$ 934,839.91	\$ 137,589.44	\$ (797,250.47)	-85%
22-May-13	\$ 7,002,555.06	\$ 2,605,640.16	\$ (4,396,914.90)	-63%
23-May-13	\$ 6,125,558.76	\$ 3,779,988.07	\$ (2,345,570.69)	-38%
27-May-13	\$ 817,087.72	\$ 196,131.77	\$ (620,955.95)	-76%
Total	\$ 16,241,505.41	\$ 7,780,223.48	\$ (8,461,281.93)	-52%



28



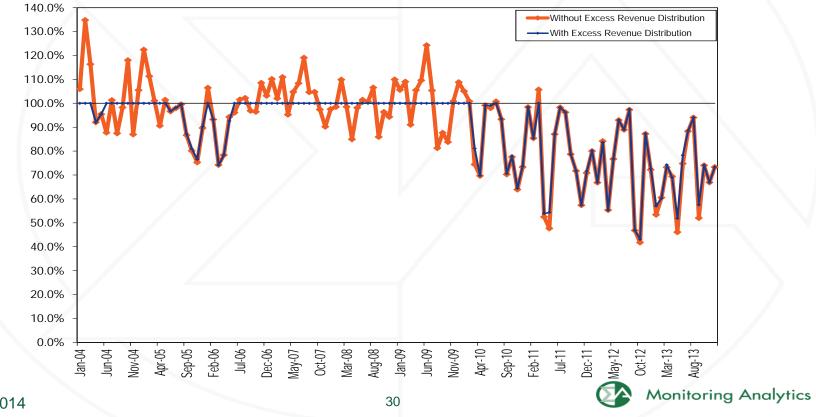
UTC Analysis: FTR Underfunding

Date	Actual Underfunding	No UTC Underfunding	Difference in Inderfunding	Change in Underfunding
2-May-13	\$ (440,207.00)	\$ (399,119.97)	\$ 41,087.03	-9%
4-May-13	\$ (290,472.92)	\$ 153,428.99	\$ 443,901.91	-153%
22-May-13	\$ (1,643,019.83)	\$ 1,375,704.81	\$ 3,018,724.64	-184%
23-May-13	\$ (1,746,891.15)	\$ (628,183.15)	\$ 1,118,708.00	-64%
27-May-13	\$ (26,063.59)	\$ 35,212.85	\$ 61,276.44	-235%
Total	\$ (4,146,654.49)	\$ 537,043.53	\$ 4,683,698.02	-113%

29



Figure 13-19 FTR payout ratio by month, excluding and including excess revenue distribution: January 2004 through December 2013



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UTC Summary of Recommendations

- The IMM recommends that UTCs be allocated uplift charges immediately, consistent with the treatment of INCs and DECs, pending further changes approved in the stakeholder process.
- FTR forfeiture rule should be applied uniformly to all virtual bids and offers

31

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