

# Capacity Senior Task Force Final Report

### **Capacity Market Triennial Review**

### 1. Issue Summary

As mandated by the PJM Open Access Transmission Tariff (Tariff), PJM is required to review key parameters of its Capacity Market. Section 5.10 a) of Attachment DD of the PJM Tariff contains requirements for a periodic, on-going assessment of the:

- a. Shape of the VRR Curve, or demand curve, shape which can affect price stability and provides and investment signal for capacity;
- b. Cost of New Entry (CONE) based on an engineering analysis which provides an estimation of the cost of new construction of the reference resource; and
- c. Net Energy and Ancillary Services Revenue Offset (E&AS Offset) methodology which provides an estimate of the non-capacity revenues that a generator can expect to earn.

### 2. Issue History

Issue Catalyst: Tariff mandate, Section 5.10 a

Action: To perform the RPM Parameter review, PJM retained The Brattle Group, which has conducted prior RPM evaluations, following an RFP to leading energy and economic consulting firms. Brattle's review was completed by May 15, 2014. PJM staff recommendations were posted on May 15, 2014 as well. Final stakeholder approval of recommendations will be due on August 31, 2014 and filed with FERC by October 1,

Meeting history: Brattle reviewed their draft report on April 29, 2014. The CSTF began their meetings on this issue on May 9, 2014. Eleven meetings took place.

### Packages

#### PJM Package

Gross CONE: The PJM package updates the Gross CONE values for each CONE area as estimated in Brattle's 2014 Gross CONE analysis under the following assumptions:

- Maintain the CT as the Reference Resource assuming dual-fuel capability and selective catalytic reduction technology in all CONE areas
- Maintain level-nominal levelization method
- Use Bureau of Labor Statistics indices for labor, material and turbine as opposed to Handy-Whitman Index to escalate gross CONF
- Eliminate CONE Area 5 and place the Dominion Zone into CONE Area 3 for purpose of assigning a gross CONE value to the Dominion Zone
- Define the RTO-wide Gross CONE as being the average Gross CONE of the four CONE Areas

VRR Curve Shape: The PJM package replaces the current concave-shaped curve with the convex-shaped curve recommended by Brattle and shifts this entire curve to the right by 1%.

Net E&AS Offset: The PJM package proposes the implementation of a forward-looking Net E&AS calculation methodology and proposes the following changes to the determination of each modeled LDA's Net CONE:

- Determine a Net E&AS and Net CONE value calculated for each Transmission Zone. For zonal or sub-zonal LDAs, use the Net CONE calculated for that Zone. For LDAs that comprise multiple zones, use the average of the Net CONE values determined for each of the applicable Zones.
- Maintain current method for determination of RTO-wide Net Cone which utilizes the PJM weighted-average LMP.



 If the Net CONE of an LDA is lower than the Net CONE of immediately higher parent LDA then substitute with Net CONE of the Parent LDA.

### Package B

Gross CONE: Package B updates the Gross CONE values using recalculated Brattle recommended values for Gross CONE applying 13.5% after-tax WACC for each CONE area under the following assumptions:

- Maintain the CT as the Reference Resource assuming dual-fuel capability and selective catalytic reduction technology in all CONE areas
- Maintain level-nominal levelization method
- Use Bureau of Labor Statistics indices for labor, material and turbine as opposed to Handy-Whitman Index to escalate gross CONE
- Eliminate CONE Area 5 and place the Dominion Zone into CONE Area 3 for purpose of assigning a gross CONE value to the Dominion Zone
- Define the RTO-wide Gross CONE as being the average Gross CONE of the four CONE Areas

VRR Curve Shape: Package B replaces the current concave-shaped curve with the convex-shaped curve recommended by Brattle and shifts this entire curve to the right by 2%.

Net E&AS Offset: Package B proposes Status Quo: 3 year backward-looking average of E&AS revenues determined using peak-hour dispatch of reference resource

- Determine a Net E&AS and Net CONE value calculated for each Transmission Zone. For zonal or sub-zonal LDAs, use the Net CONE calculated for that Zone. For LDAs that comprise multiple zones, use the average of the Net CONE values determined for each of the applicable Zones.
- Maintain current method for determination of RTO-wide Net Cone which utilizes the PJM weighted-average LMP.
- If the Net CONE of an LDA is lower than the Net CONE of immediately higher parent LDA then substitute with Net CONE of the Parent LDA.

#### Package I

Gross CONE: Package I updates the Gross CONE values for each CONE area as estimated in Brattle's 2014 Gross CONE analysis under the following assumptions:

- Maintain the CT as the Reference Resource assuming dual-fuel capability and selective catalytic reduction technology in all CONE areas
- Maintain level-nominal levelization method
- Use Bureau of Labor Statistics indices for labor, material and turbine as opposed to Handy-Whitman Index to escalate gross CONE
- Eliminate CONE Area 5 and place the Dominion Zone into CONE Area 3 for purpose of assigning a gross CONE value to the Dominion Zone
- Define the RTO-wide Gross CONE as being the average Gross CONE of the four CONE Areas

VRR Curve Shape: Package I replaces the current concave-shaped curve with the convex-shaped curve recommended by Brattle and shifts this entire curve to the right by 2.5%

Net E&AS Offset: Package I proposes to calculate the historical Net EAS over last 5 calendar years and determine average of 3 remaining years after excluding the lowest and highest annual values. Also, proposes the following changes to the determination of each modeled LDA's Net CONE:



- Determine a Net E&AS and Net CONE value calculated for each Transmission Zone. For zonal or sub-zonal LDAs, use the Net CONE calculated for that Zone. For LDAs that comprise multiple zones, use the average of the Net CONE values determined for each of the applicable Zones.
- Revise current method for determination of RTO-wide Net Cone by utilizing weighted-average LMP of Rest of RTO Market.
- If the Net CONE of an LDA is lower than the Net CONE of immediately higher parent LDA then substitute with Net CONE of the Parent LDA.

# 4. Comparative Summary

Design Component	Status Quo	PJM	В	I
Gross CONE	CONE values for for 18/19 BRA (kW-year): CONE Area 1: \$161.00 CONE Area 2: \$150.70 CONE Area 3: \$148.00 CONE Area 4: \$155.20 CONE Area 5: \$132.40 Adjusted annually by HWI CONE Values	BRA (kW-year):  1.00		Same as PJM
Levelization Method	Level-Nominal	Status Quo	Status Quo	Status Quo
Reference Resource	CT with SCR technology in CONE areas 1, 2, 3, and 4; and dual fuel capability in all CONE areas	CT with SCR technology in all CONE areas and dual fuel capability in all CONE areas	Same as PJM	Same as PJM
Net E&AS Offset	Backward Looking	Forward Looking	Status Quo	Historical - 5 year without hi/low years
VRR Shape – System	Concave	Convex, shift right Brattle + 1%	Convex, shift right Brattle + 2%	Convex, shift right Brattle + 2.5%
VRR Shape – Local	Same as System	Same as System	Same as System	Same as System
CONE Escalation Index	HW	BLS	Same as PJM	Same as PJM
RTO Wide Gross CONE	\$147.70 for 18/19 BRA (kW- year) adjusted annually by HWI	Use average of CONE Areas	Same as PJM	Same as PJM
Net CONE Method – CONE Area	Determine Net EAS for each CONE Area using peak-period dispatch against zonal LMP for zone in which reference resource assumed to be constructed for gross CONE determination purposes.	Do not determine a Net CONE for each CONE Area; instead, determine a Net CONE for each zone using the Gross CONE of the CONE Area to which the zone is assigned minus the Net EAS for each zone using peakperiod dispatch against the applicable zonal LMP.	Same as PJM	Same as PJM
Net CONE Method – RTO	RTO-Wide Gross CONE - PJM wtd-avg LMP	Status Quo	Status Quo	RTO-wide Gross Cone - PJM Weighted Average LMP for Rest of Market
Net CONE Method – LDA	For zonal or sub-zonal LDA or any LDA wholly contained within one CONE Area, use the Net CONE determined for the CONE	For Zonal or sub-zonal LDAs, use the Net CONE calculated for that Zone. For LDAs that comprise multiple zones, use the	Same as PJM	Same as PJM



Area in which the zone is assigned. For LDAs that span multiple CONE Areas, use the lowest Net CONE of the applicable CONE Areas (e.g., MAAC: Lower Net CONE of CONE Areas (1,2,4) average of the Net CONE determined for each of the applicable Zones. If the Net CONE of an LDA is lower than the Net CONE of immediately higher parent LDA then substitute with Net CONE of the Parent LDA.

# 5. <u>Senior Task Force Vote Results</u>

	Triennial Review Vote Results August 2014									
	Package A	Package B	Package C	Package D	Package E	Package F	Package G	Package H	Package I	Package J
Yes	50	105	10	44	50	73	48	70	99	55
No	112	68	163	129	123	99	123	92	73	118
Abstain	12	1	1	1	1	2	3	12	2	1
Total	174	174	174	174	174	174	174	174	174	174
Level of Support	31%	61%	6%	25%	29%	42%	28%	43%	58%	32%

# Appendix I: Polling Results

Triennial Review Package Polling Results August 2014									
	Package A	Package B	Package C	Package D	Package E	Package F	Package G	Package H	Package I
Yes	77	107	35	37	36	88	46	88	108
No	112	82	154	152	153	101	143	101	81
Total	189	189	189	189	189	189	189	189	189
Level of Support	41%	57%	19%	20%	19%	47%	24%	47%	57%

## Appendix II: Supplemental Documents

- PJM Preliminary Triennial Review Recommendations
- Brattle Draft Study Results Triennial Review of RPM
- Work plan
- Action Items and Responses
- BRA VRR Curve Simulation Results
- LOLE IRM Relationship
- Monte Carlo Simulation Draws for Illustration
- Simplified Clearing Model



- Options and Solutions Matrix
- Matrix Summary View

# Appendix III: Stakeholder Participation

Last Name	First Name	Company Name	Sector
Ainspan	Malcolm	Energy Curtailment Specialists, Inc.	Other Supplier
Anders	David	PJM Interconnection, LLC	Not Applicable
Baran	Eric	Allegheny Electric Cooperative, Inc.	Electric Distributor
Barker	Jason	Exelon Business Services Company, LLC	Transmission Owner
Bastian	Jeff	PJM Interconnection, LLC	Not Applicable
Benchek	Jim	FirstEnergy Solutions Corporation	Transmission Owner
Bhavaraju	Murty	PJM Interconnection, LLC	Not Applicable
Bloom	David	Baltimore Gas and Electric Company	Transmission Owner
Bolan	Martin	FirstEnergy Solutions Corporation	Transmission Owner
Borgatti	Michael	Gable and Associates	Not Applicable
Bowring	Joe	Monitoring Analytics, LLC	Not Applicable
Boyle	Stephen	PJM Interconnection, LLC	Not Applicable
Bresler	Stu	PJM Interconnection, LLC	Not Applicable
Brodbeck	John	Potomac Electric Power Company	Electric Distributor
Brown	Rich	PJM Interconnection	Not Applicable
Brownell	Stan	PJM Interconnection, LLC	Not Applicable
Bruno	Patrick	PJM Interconnection, LLC	Not Applicable
Burns	Wil	Burns Law Firm	Not Applicable
Campbell	Bruce	EnergyConnect, Inc.	Other Supplier
Canter	David	Appalachain Power Company	Transmission Owner
Carmean	Gregory	OPSI	Not Applicable
Carretta	Kenneth	PSEG Energy Resources and Trade LLC	Transmission Owner
Chen	Xu	Monitoring Analytics, LLC	Not Applicable
Citrolo	John	PSEG Energy Resources and Trade LLC	Transmission Owner
Сох	Jason	Dynegy Power Marketing, Inc.	Generation Owner
Currier	Jeff	Dominion Virginia Power	Not Applicable
Czigler	Frank	Public Service Electric & Gas Company	Transmission Owner
De Geeter	Ralph	Maryland Public Service Commission	Not Applicable
Dean	Evan	FirstEnergy Solutions Corporation	Transmission Owner
Demuynck	Rene	New Jersey Board of Public Utilities	Not Applicable
DeNavas	Joseph	Potomac Electric Power Company	Electric Distributor
Dugan	Bill	Customized Energy Solutions, Ltd.*	Not Applicable
Dugan	Chuck	East Kentucky Power Cooperative, Inc.	Transmission Owner
Egan	Amanda	PJM Interconnection, LLC	Not Applicable
Esposito	Patricia	Atlantic Grid Operations A, LLC	Other Supplier
Etnoyer	Scott	Raven Power Marketing LLC	Generation Owner
Everngam	Scott	The Federal Energy Regulatory Commission	Not Applicable
Evrard	David	Pennsylvania Office of Consumer Advocate	End User Customer
Farber	John	DE Public Service Commission	Not Applicable
Feierabend	Rick	Dominion Virginia Power	Not Applicable



Filomena	Guy	Customized Energy Solutions, Ltd.*	Not Applicable
Fink	Sari	Office of the Ohio Consumers' Counsel	End User Customer
Fisher	Amy	Linden VFT LLC	Transmission Owner
Fitch	Neal	NRG Power Marketing LLC	Generation Owner
Flynn	Paul	PJM Interconnection, LLC	Not Applicable
Foladare	Kenneth	IMG Midstream LLC	Generation Owner
Ford	Adrien	PJM Interconnection, LLC	Not Applicable
Fort	Jim	The Energy Authority	Other Supplier
Frelich	Jessica	Integrys Energy Services, Inc.	Other Supplier
Fuess	James	PBF Power Marketing LLC	Generation Owner
Gebolys	Debbie	Ohio PUC	Not Applicable
Gilani	Rehan	ConEdison Energy, Inc.	Other Supplier
Greening	Michele	PPL EnergyPlus, L.L.C.	Transmission Owner
Griffiths	Dan	Consumer Advocates of PJM States	Not Applicable
Guerry	Katie	EnerNOC, Inc.	Other Supplier
Hagaman	Derek	GT Power Group	Transmission Owner
Hall II	Walter	Maryland Public Service Commission	Not Applicable
-	David	Market Interconnection LLC	
Hastings Heidorn	Richard		Not Applicable
-		RTO Insider Ohio PUC	Not Applicable
Heizer	Fred		Not Applicable
Higgins	Craig	North Carolina Electric Membership Corporation	Electric Distributor
Hoatson	Tom	Riverside Generating, LLC	Other Supplier
Hoeplinger	John	NRG Power Marketing LLC	Generation Owner
Horning	Lynn	PJM Interconnection, LLC	Not Applicable
Horstmann	John	Dayton Power & Light Company (The)	Transmission Owner
Horton	Dana	Appalachian Power Company	Transmission Owner
Hugee	Jacqulynn	PJM Interconnection, LLC	Not Applicable
Hyzinski	Tom	PPL EnergyPlus, L.L.C.	Transmission Owner
Jablonski	James	Borough of Butler, Butler Electric Division	Electric Distributor
Jennings	Kenneth	Duke Energy Business Services LLC	Generation Owner
Jett	William	Duke Energy Business Services LLC	Generation Owner
Johnson	Carl	Customized Energy Solutions, Ltd.*	Not Applicable
Jones	Ryan	Allegheny Electric Cooperative, Inc.	Electric Distributor
Kerecman	Joseph	Calpine Energy Services, L.P.	Generation Owner
Kogut	George	New York Power Authority	Other Supplier
Kopon	Owen	Brickfield, Burchett, Ritts, and Stone, PC	Not Applicable
Lacy	Catharine	Dominion Virginia Power	Not Applicable
Langbein	Pete	PJM Interconnection, LLC	Not Applicable
LaRocque	Matthew	PJM Interconnection, LLC	Not Applicable
Leimann	John	Dominion Virginia Power	Not Applicable
Levine	Jeffrey	IPR-GDF SUEZ Energy Marketing NA, Inc.	Other Supplier
Lewis	Cara	PSEG Energy Resources and Trade LLC	Transmission Owner
Lieberman	Steven	Old Dominion Electric Cooperative	Electric Distributor
Lipman	Brian	New Jersey Division of Rate Counsel	End User Customer
Ma	Alex	Invenergy	Generation Owner
Mabry	David	McNees Wallace & Nurick LLC	Not Applicable



Maher	Mollie	PPL EnergyPlus, L.L.C.	Transmission Owner	
Mahoney	Julianne	New York State Electric & Gas Corporation	Other Supplier	
Manning	James	North Carolina Electric Membership Corporation	Electric Distributor	
Mariam	Yohannes	Office of the Peoples Counsel for the District of Columbia	End User Customer	
Marton	David	FirstEnergy Solutions Corporation	Transmission Owner	
Marzewski	Skyler	Monitoring Analytics, LLC	Not Applicable	
Matheson	Erin	Pennsylvania Public Utility Commission	Not Applicable	
Mattfolk	Alexander	Levitan Associates	Not Applicable	
Maucher	Andrea	Division of the Public Advocate of the State of Delaware	End User Customer	
Maye	Shelly-Ann	North America Power Partners LLC	Other Supplier	
McAlister	Lisa	American Municipal Power, Inc.	Electric Distributor	
McDonnell	Patrick	Pennsylvania Public Utility Commission	None	
McGuirk	Brian	Direct Energy Business Marketing, LLC	Other Supplier	
McNamara	Sean	PJM Interconnection, LLC	Not Applicable	
Merola	Becky	Noble Americas Energy Solutions LLC	Other Supplier	
Miller	John	Commonwealth Edison Company	Transmission Owner	
Moerner	Lisa	Virginia Electric & Power Company	Transmission Owner	
Norton	Chris	American Municipal Power, Inc.	Electric Distributor	
O'Connell	Robert	JPMorgan Ventures Energy Corporation	Other Supplier	
Ondayko	Brock	Appalachain Power Company	Transmission Owner	
Orlando	James	Northern Indiana Public Service Company	Other Supplier	
Pakela	Greg	DTE Energy Trading, Inc.	Other Supplier	
Patel	Kishan	Consolidated Edison Company of NY, Inc.	Transmission Owner	
Patten	Kevin	Appalachain Power Company	Transmission Owner	
Peoples	John	Duquesne Light Company	Transmission Owner	
Perrotti	Frank	New Jersey Board of Public Utilities	Not Applicable	
Polakowski	Ray	Hess Corporation	Other Supplier	
Poulos	Greg	EnerNOC, Inc.	Other Supplier	
Pratzon	David	GT Power Group	Not Applicable	
Price	Ruth	Division of the Public Advocate of the State of Delaware	End User Customer	
Puchyr	Lindsey	PJM Interconnection, LLC	Not Applicable	
Quinlan	Pamela	Rockland Electric Company	Transmission Owner	
Riding	MQ	Essential Power Rock Springs, LLC	Transmission Owner	
Rismiller	Randy	Illinois Commerce Commission	Not Applicable	
Rivera	Diana	CleanLine Energy	Not Applicable	
Rohrbach	John	Southern Maryland Electric Cooperative	Electric Distributor	
Rutigliano	Tom	Achieving Equilibrium LLC	Other Supplier	
Salaneck	Alexandra	Monitoring Analytics, LLC	Not Applicable	
Sasser	Jonathan	PJM Interconnection, LLC	Not Applicable	
Scarpignato	David	Direct Energy Business Marketing, LLC	Other Supplier	
Schmitt	Jeff	PJM Interconnection, LLC	Not Applicable	
Scoglietti	Barbara	Tangent Energy Solutions, Inc.	Other Supplier	
Scott	Mark	Monument Energy LLC	None	
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Shanker	Roy	Independent Consultant	Other Supplier	
Shparber	Steven	PJM Interconnection, LLC	Not Applicable	
Sitaraman	Nicole	Office of the Peoples Counsel for the District of Columbia	t of End User Customer	
Slade	Louis	Virginia Electric & Power Company	Transmission Owner	
Sotkiewicz	Paul	PJM Interconnection, LLC	Not Applicable	
Stadelmeyer	Rebecca	Exelon Business Services Company, LLC	Transmission Owner	
Stuchell	Jeff	FirstEnergy Solutions Corporation	Transmission Owner	
Sudhakara	Raghu	Rockland Electric Company	Transmission Owner	
Suh	Jung	Noble Americas Energy Solutions LLC	Other Supplier	
Swalwell	Bradley	Tangent Energy Solutions, Inc.	Other Supplier	
Thomas-Friel	Felicia	New Jersey Division of Rate Counsel	End User Customer	
Trayers	Barry	Citigroup Energy, Inc.	Other Supplier	
Tribulski	Jennifer	PJM Interconnection, LLC	Not Applicable	
Vickers	Justin	Environmental Law & Policy Center	Not Applicable	
Walter	Laura	PJM Interconnection, LLC	Not Applicable	
Wilmoth	Emily	Dominion Virginia Power	Not Applicable	
Wilson	James	Wilson Energy Economics	Not Applicable	
Wisersky	Megan	Madison Gas & Electric Company	Other Supplier	
Worthem	Dennis	Independent Observer from Ohio	Not Applicable	
Xenopoulos	Damon	Brickfield, Burchette, Ritts & Stone, P.C.	Not Applicable	

# Appendix III: Proposals Not Meeting the Threshold

Package C

Gross CONE: PJM ~ 15%

Levelization Method: Level nominal

Reference Resource: CT

Net E&AS Offset: Forward looking

VRR Shape – System: Convex, shift right Brattle + 3.5%

VRR Shape – Local: Same as system

CONE Escalation Index: BLS RTO Wide Gross CONE: Lowest

Net CONE Method – CONE Area: CONE Area – Zone E&AS using full economic dispatch

Net CONE Method – RTO: Minimum

Net CONE Method - LDA: Lowest net CONE

# Package D

Gross CONE: PJM ~15% Levelization Method: Level real Reference Resource: CT

Net E&AS Offset: Forward looking

VRR Shape – System: Status Quo or Something Left

VRR Shape – Local: Same as system

CONE Escalation Index: BLS

RTO Wide Gross CONE: Average CONE Areas

Net CONE Method – CONE Area: CONE Area – Zone E&AS using peak period dispatch

Net CONE Method - RTO: RTO Wide Gross CONE PJM weighted average LMP

Net CONE Method – LDA: Updated PJM (without flooring to parent LDA)



Package E

Gross CONE: PJMBrattle as adjusted by 7.26% ATWACC

Levelization Method: Level Nominal

Reference Resource: CT

Net E&AS Offset: Forward looking VRR Shape – System: Status Quo VRR Shape – Local: Same as system

**CONE Escalation Index: BLS** 

RTO Wide Gross CONE: Average CONE Areas

Net CONE Method – CONE Area: CONE Area – Zone E&AS using full economic dispatch

Net CONE Method - RTO: RTO Wide Gross CONE PJM weighted average LMP

Net CONE Method – LDA: Updated PJM (without flooring to parent LDA)

Package F

Gross CONE: Updated PJM Levelization Method: Level Nominal

Reference Resource: CT

Net E&AS Offset: Forward looking

VRR Shape – System: PJM with a floor of .6 x net CONE

VRR Shape – Local: Same as system

**CONE Escalation Index: BLS** 

RTO Wide Gross CONE: Average CONE Areas

Net CONE Method – CONE Area: CONE Area – Zone E&AS using peak period dispatch

Net CONE Method - RTO: RTO wide Gross Cone PJM Weighted Average LMP for Rest of Market

Net CONE Method – LDA: Updated PJM

Package G

Gross CONE: Updated PJM

Levelization Method: Level Nominal for capital cost, level real for non-capitalcosts

Reference Resource: CT

Net E&AS Offset: Historical 5 year without hi/low years

VRR Shape – System: Status Quo VRR Shape – Local: Same as system

**CONE Escalation Index: BLS** 

RTO Wide Gross CONE: Average CONE Areas

Net CONE Method – CONE Area: CONE Area – Zone E&AS using peak period dispatch

Net CONE Method – RTO: RTO Wide Gross CONE PJM weighted average LMP

Net CONE Method – LDA: Updated PJM (without flooring to parent LDA)

Package H

Gross CONE: Updated PJM

Levelization Method: Level Nominal

Reference Resource: CT

Net E&AS Offset: Historical 5 year without hi/low years VRR Shape – System: Convex, shift right Brattle + 1%

VRR Shape - Local: Same as system

CONE Escalation Index: BLS

RTO Wide Gross CONE: Average CONE Areas

Net CONE Method – CONE Area: CONE Area – Zone E&AS using peak period dispatch

Net CONE Method - RTO: RTO Wide Gross CONE PJM weighted average LMP



# Net CONE Method – LDA: Updated PJM

Package J

Gross CONE: IMM capital costs/FOM +7.26% ATWACC

Levelization Method: Level Nominal

Reference Resource: CT

Net E&AS Offset: Forward looking VRR Shape – System: Status Quo VRR Shape – Local: Same as system

**CONE Escalation Index: BLS** 

RTO Wide Gross CONE: Lowest Zonal

Net CONE Method – CONE Area: CONE Area – Zone E&AS using full economic dispatch

Net CONE Method – RTO: Minimum

Net CONE Method - LDA: Lowest net CONE