

Updated Hourly Offers Proposal Overview

GOFSTF September 3, 2015



The previous proposal linked the price schedule to cost schedule in order to limit the amount by which a price based schedule could be increased and reduce opportunity for market manipulation

- Complex implementation, difficult to articulate to users in advance what an allowable price based schedule increase would be
- Required locking generation owners out of eMKT under a varied set of circumstances which increased complexity
- Did not allow the uncommitted portion of price schedule to be updated in real time



Guiding Principles

- PJM felt it was important to update the proposal with the following guiding principles in mind
 - Keep the implementation as simple as possible (within reason) given the deadline to implement changes prior to winter 2016/17
 - Allow resources to articulate and recover their costs
 - Allow price based schedules to be updated in real time
 - Eliminate foreseeable opportunities for market abuse
 - Minimize schedule switching throughout the day
 - Avoids undesirable dispatch patterns that could impact system cost and control

3



- Schedules can be differentiated hourly (24 individual offer values)
- Both Cost and Price based schedules may be increased or decreased in real time for both committed and uncommitted hours
- Amount of the change is not limited for market-based offers. Cost-based offers are limited by the existing provisions in the cost development guidelines and the resource's approved fuel cost policy
- Operating Reserve deviations are assessed to units that update their offers in RT (with some exceptions)
- TPS test is not materially changed



- Increases to cost based schedule are limited to increases in fuel cost component of offer. This agrees with the IMM.
- Cost based offers must still comply with the rules in Manual 15: Cost Development Guidelines (capped at cost + 10%)
 - Cost based offers must be updated hourly **during uncommitted hours** to reflect a decrease in cost whenever the previously submitted cost based offer exceeds cost + 10%
 - Would only apply to units with a fuel cost policy that is based on a reference price that can change intraday
 - Only applies to hours without a DA or RT commitment so that unit isn't forced to incur deviation charges (see operating reserve deviation updates in package)
 - Not required to raise cost based offers when costs increase



Price Based Offer Change

- Increases to price based schedules will not be limited
 - However, offers that increase by more than 10% from originally committed value or from the previous hour will be flagged for further review.
- Price based schedules can be changed without a corresponding change in the cost based schedule
 - During commitment extensions, increases in the price-based offer beyond 10% without a change in cost will result in forfeiture of make-whole for extended hours.



Allowable Schedule Updates in Real Time

Committed DA	Committed RT	Committed on	Change cost for committed hrs	Change price for committed hrs	Change cost uncommitted hrs	Change price uncommitted hrs
Y	Ν	Price	Yes (increase and decrease)	Yes (increase and decrease)	Yes (increase and decrease)	Yes (increase and decrease)
Y	Ν	Cost				
N	Y (Comm. RT for min run)	Price				
N	Y (Comm. RT for min run)	Cost				
N	N	NA	NA	NA		





- The frequency of the Three Pivotal Supplier (TPS) test for market power will remain unchanged
 - Units will only be tested at the time of DA or RT commitment
 - Units having their commitment extended will not be retested. Potential forfeiture of a portion of the make-whole for extended hours.
- The test will be updated to take into account hourly differentiated price/MW pairs, start up costs and no load costs.



The updated proposal includes changes on both the charge and credit sides of the uplift equation

- Balancing Operating Reserve Credits
 - Changes proposed to the version of schedule to which a resource will be made whole
 - Change proposed in the balancing value portion of the calculation
- Balancing Operating Reserve Charges
 - Resources that change their offer for previously committed hours will be subject to additional deviation charges
- Lost Opportunity Cost Credits
 - Changes proposed to the version of the schedule on which a resource will be compensated



Schedule Version Used for BOR Credits

- Day-Ahead Operating Reserves will be unchanged.
- Resources <u>with</u> a DA commitment will be made whole in real-time to the lesser of:
 - the DA committed offer
 - the RT updated offer
- Resources <u>without</u> a DA commitment will be made whole for the longer of the resource's minimum run time or specified commitment duration to the lesser of:
 - the offer available at the time the RT commitment is made
 - the RT updated offer



- Resources being brought on early or having their commitment extended in real-time will be made whole for the remainder of their run time using the RT offer curve (price or cost) in effect at the time the commitment to extend the unit is made.
 - If a resource increases its price based offer by more than 10% in the hours adjacent to a pre-existing commitment without a corresponding increase in the cost based offer, the resource will be made whole using the offer value used for the adjacent committed hour's make whole payment.





- PJM proposes a change to the calculation of the Balancing Value used in the Balancing Operating Reserve Credit
 - Addresses case for unit committed in DA and increases offer in RT resulting in unit being dispatched down.
 - As a result the unit has to buy back energy in RT.
 - Absent a change, BOR credits would compensate the unit for the buy back due to Balancing Value going negative.

Balancing Value = (RT Generation MWh – DA Scheduled MWh) x RT Generator LMP

Where RT Generation MWh is greater of

[RT Generation MWh

Or

Lesser of (Greater of (RT Dispatch Desired MWh and Original Schedule Desired MWh using the committed offer schedule) and DA Scheduled MWh)]

Bal Op Res Credit = RT Offer – Balancing Value – DA Value – DA Operating Reserve Credit – Any Sync/Non Sync/Reactive/DASR revenue



Original Cost Offer - DA

Segment	MW	Price
1	50	5
2	100	10

Existing Balancing Value Calculation Example

Updated Cost Offer - RT			
Segment	MW	Price	
1	50	10	
2	100	15	

In RT, LMP = \$10 and unit is dispatched at 50 MW

In DA, LMP = 10 and unit clears at 100 MW

Applying the existing Balancing Value equation:

```
RT Generation MWh is greater of
[RT Generation MWh (50 MW)
Or
Lesser of (RT Dispatch Desired MWh (50 MW) and DA Scheduled MWh (100 MW))]
```

RT Generation MWh = 50 MW

Balancing Value = (RT Generation MWh (50 MW) – DA Scheduled MWh (100 MW)) x RT Generator LMP (\$10) = -\$500 A negative balancing value results in an



Original Cost Offer - DA

Segment	MW	Price
1	50	5
2	100	10

Proposed Balancing Value Calculation Example

	Updated Cost Offer - RT			
1	Segment	MW	Price	
	1	50	10	
	2	100	15	

In RT, LMP = \$10 and unit is dispatched at 50 MW

In DA, LMP = \$10 and unit clears at 100 MW

Applying the proposed Balancing Value equation:

```
RT Generation MWh is greater of

[RT Generation MWh (50 MW)

Or

Lesser of (Greater of (RT Dispatch Desired MWh (50 MW) and Original Schedule

Desired MWh (100 MW) using the committed offer schedule) and DA Scheduled MWh (100 MW))]
```

RT Generation MWh = 100 MW

Balancing Value = (RT Generation MWh (100 MW) – DA Scheduled MWh (100 MW)) x RT Generator LMP (\$10) = \$0



- Resources will continue to incur deviations caused by not following DA schedule or RT dispatch, as per existing rules
- Resources will now also be subject to additional deviation charges for updating their offer for a previously committed hour
 - Additional deviations = difference between LMP desired MW based on offer at the time of the commitment (DA or RT) and LMP desired MW based on the RT updated offer
 - There will likely be exceptions to this rule (still under discussion)

LOC Changes

- CT LOC will be calculated using the higher of:
 - the DA committed offer
 - the RT updated offer
- LOC for reliability reduction
 - Pool scheduled resources will be compensated using the *higher* of:
 - the DA committed offer
 - the RT updated offer
 - Self-scheduled resources will be compensated using the *higher* of:
 - All DA available price or cost offers (regardless of which schedule the resource is currently committed on)
 - All RT available price or cost offers (regardless of which schedule the resource is currently committed on)

LOC Changes Continued

LOC for units providing reactive support

- Unit *reduced* to provide reactive support: calculation will be the same as for a reliability reduction (previous slide)
- **Pool scheduled** resources whose output has been **increased** will use the *lesser* of:
 - The DA committed offer
 - The RT updated offer
- Self-scheduled resources whose output has been *increased* will use the *lesser* of:
 - All DA submitted price or cost offers (regardless of which schedule the resource is currently committed on)
 - All RT available price or cost offers (regardless of which schedule the resource is currently committed on)



Ramifications to Updating Schedule in RT

Several of the proposed changes combine to provide a strong disincentive for speculative offer changes

- New Schedule Deviations (on top of existing generator deviations)
- If dispatched down due to increased offer, not made whole for buy back in RT (change to balancing value calculation)
- Make whole is limited in hours in which a unit is extended if offer increases more than 10%
- Capacity Performance Penalties (\$~4000/MWh) for being dispatched down in a performance hour and price based offer is greater than cost offer
 - Section 10A(d) of Attachment DD of the OATT