



Introduction to Markets

October 25, 2020
Virtual Meeting

Moderator Hon. Upendra Chivukula,
New Jersey BPU

Panelist Joe Bowring,
Monitoring Analytics

Welcome

During the webinar:

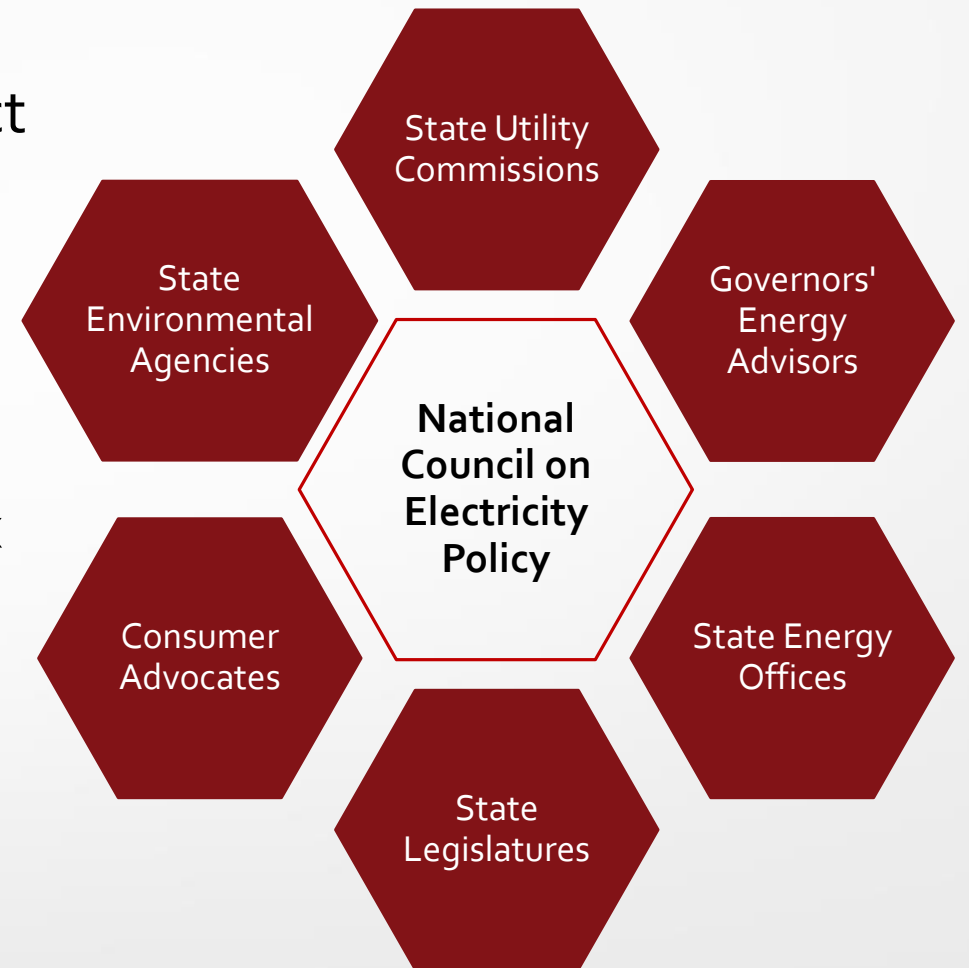
- This webinar is being recorded.
- Type in Questions anytime in the GoToWebinar application.
- “Raise Hand” to be unmuted (the moderator will call on you).

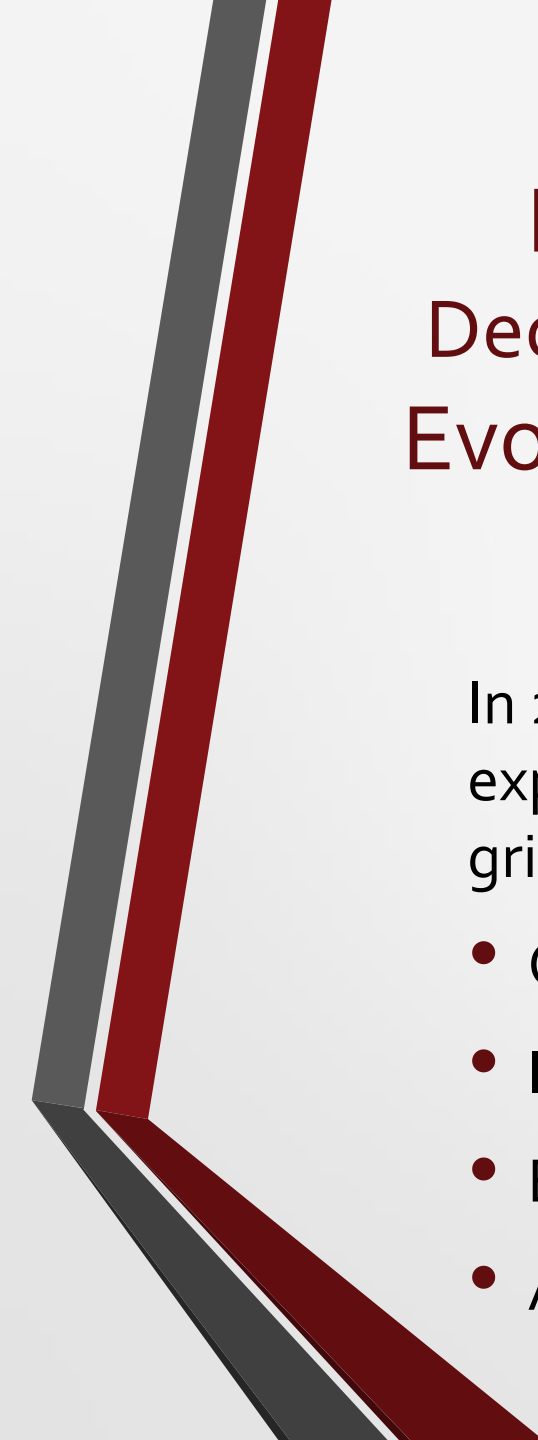
After the webinar:

- Presentation and recording posted on www.electricitypolicy.org.
- Unanswered questions will be sent to panelist for follow up.
- Point of contact:
Kerry Worthington
kworthington@naruc.org

The National Council on Electricity Policy (NCEP)

- NCEP is a peer-learning platform to examine the ways new technologies, policies, regulations, and markets impact state resources and the bulk power system.
- NCEP is currently exploring the evolving interface between the transmission and distribution systems as the resource mix on the grid changes (planning, operations, and markets).
- **All NCEP resources are available at www.electricitypolicy.org.**
- NCEP thanks the U.S. Department of Energy for its ongoing support. NCEP is an affiliate project of NARUC.





NCEP Annual Meeting and Workshop 2020

December 7, 8, and 9, 2020 (afternoons Eastern Time)

Evolving Compensation and Market Mechanisms

[Registration Open](#)

In 2020, NCEP will continue it's multi-year T&D coordination theme and explore the age-old utility question of "who pays?" with a new twist from grid modernization: "how?" Session Concepts include:

- Operational Considerations for Distribution-Level Markets
- Introduction to Compensation and Market Mechanisms
- Exploring Optimization through Benefit-Cost Analysis
- A Future with Customer-Level Markets

US DOE Notice of Opportunity for Technical Assistance (NOTA):

- [NOTA to Support Hydropower Decision Making](#)
 - An informational [webinar](#) will take place on November 4 at 2PM (ET).
- [NOTA for Connected Communities](#)
 - Purpose is to demonstrate how buildings plus DERs serve the grid



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Introduction to Wholesale Power Markets

NCEP

October 26, 2020

Joe Bowring

Independent Market
Monitor for PJM



Monitoring Analytics

PJM Market Monitor

- **MMU role is included in PJM tariff per FERC order.**
- **Since 1999, the PJM Market Monitoring Unit has been responsible for promoting a robust, competitive and nondiscriminatory electric power market in PJM by implementing the PJM Market Monitoring Plan.**
- **The MMU was internal to PJM until 2008. A dispute over independence led to the creation of a fully independent external MMU for PJM.**
- **Monitoring Analytics is the Independent Market Monitor for PJM.**

MMU functions

- **Monitoring**
 - **Compliance with market rules**
 - **Noncompetitive behavior**
 - **Retrospective mitigation**
 - **Inputs to prospective mitigation**
- **Reporting**
 - **State of the market reports**
 - **Reports on specific issues**
- **Market Design**
 - **Recommendations for improved market design**

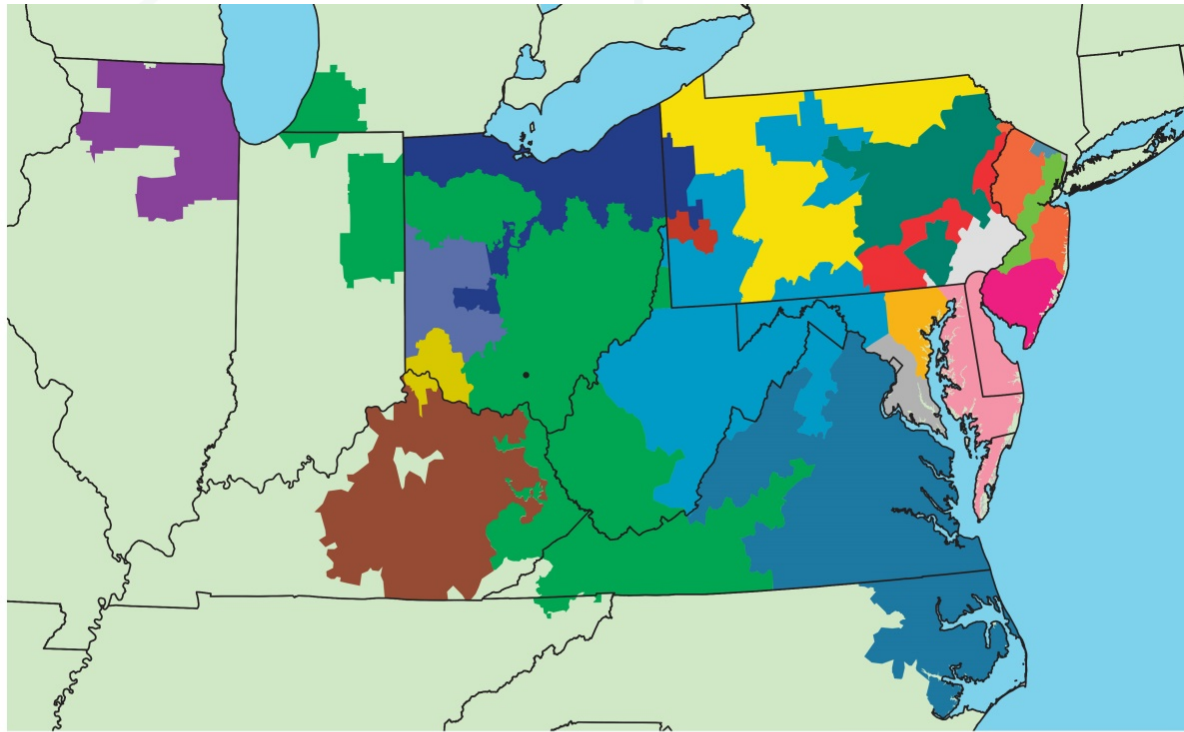


Role of markets






















- **Role of competition under the FPA**
 - Mechanism to regulate prices
 - Competitive outcome = just and reasonable
- **Relevant model of competition is not laissez faire**
- **Competitive outcomes are not automatic**
- **Detailed rules required**
 - Like other markets/exchanges
- **Comprehensive market monitoring required**
 - Of participants
 - Of RTO
 - Of rules
- **Detailed market power mitigation rules required**



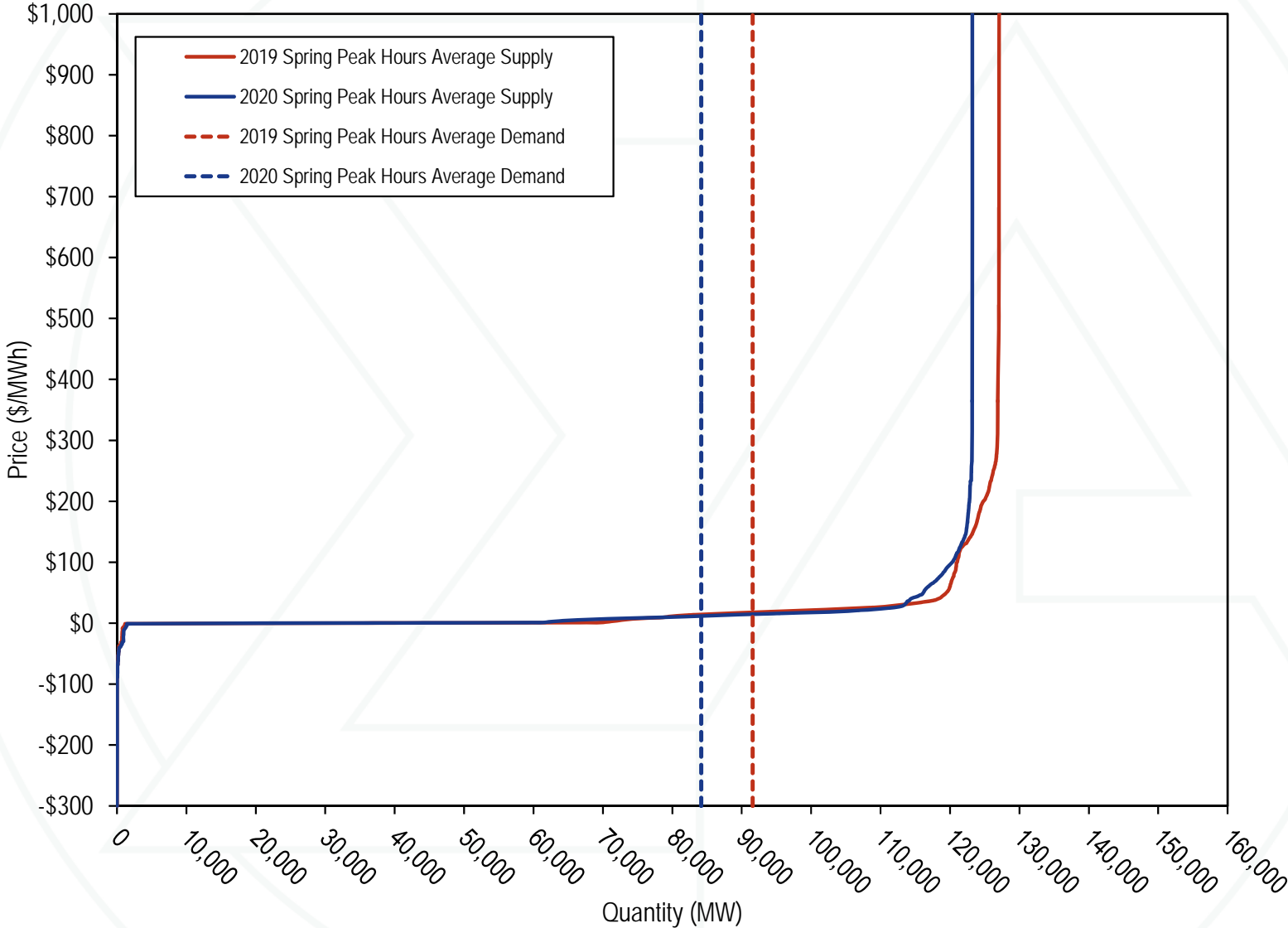
PJM: 21 control zones



Legend

 Allegheny Power Company (APS)	 Duquesne Light (DLCO)
 American Electric Power Co., Inc (AEP)	 Eastern Kentucky Power Cooperative (EKPC)
 American Transmission Systems, Inc. (ATSI)	 Jersey Central Power and Light Company (JCPL)
 Atlantic Electric Company (AECO)	 Metropolitan Edison Company (Met-Ed)
 Baltimore Gas and Electric Company (BGE)	 Ohio Valley Electric Corporation (OVEC)
 ComEd	 PECO Energy (PECO)
 Dayton Power and Light Company (DAY)	 Pennsylvania Electric Company (PENELEC)
 Delmarva Power and Light (DPL)	 Pepco
 Dominion	 PPL Electric Utilities (PPL)
 Duke Energy Ohio/Kentucky (DEOK)	 Public Service Electric and Gas Company (PSEG)
	 Rockland Electric Company (RECO)

Real-time supply curves



Real-time load

Jan-Jun	PJM Real-Time Demand (MWh)				Year-to-Year Change			
	Load		Load Plus Exports		Load		Load Plus Exports	
	Load	Standard Deviation	Demand	Standard Deviation	Load	Standard Deviation	Demand	Standard Deviation
2001	30,180	5,274	32,041	5,103	NA	NA	NA	NA
2002	32,678	6,457	33,969	6,557	8.3%	22.4%	6.0%	28.5%
2003	36,727	6,428	38,775	6,554	12.4%	(0.4%)	14.1%	(0.0%)
2004	41,787	8,999	44,808	10,033	13.8%	40.0%	15.6%	53.1%
2005	71,939	13,603	78,745	13,798	72.2%	51.2%	75.7%	37.5%
2006	77,232	12,003	83,606	12,377	7.4%	(11.8%)	6.2%	(10.3%)
2007	81,110	13,499	86,557	13,819	5.0%	12.5%	3.5%	11.6%
2008	78,685	12,819	85,819	13,242	(3.0%)	(5.0%)	(0.9%)	(4.2%)
2009	75,991	12,899	81,062	13,253	(3.4%)	0.6%	(5.5%)	0.1%
2010	78,106	13,643	83,758	14,227	2.8%	5.8%	3.3%	7.3%
2011	78,823	13,931	84,288	14,046	0.9%	2.1%	0.6%	(1.3%)
2012	84,946	13,941	89,638	13,848	7.8%	0.1%	6.3%	(1.4%)
2013	86,897	13,871	91,199	13,848	2.3%	(0.5%)	1.7%	0.0%
2014	90,529	16,266	96,189	16,147	4.2%	17.3%	5.5%	16.6%
2015	90,586	16,192	94,782	16,589	0.1%	(0.5%)	(1.5%)	2.7%
2016	85,800	14,517	89,746	14,798	(5.3%)	(10.3%)	(5.3%)	(10.8%)
2017	84,569	13,670	89,477	13,638	(1.4%)	(5.8%)	(0.3%)	(7.8%)
2018	88,847	14,683	92,352	14,818	5.1%	7.4%	3.2%	8.7%
2019	86,297	14,038	91,262	14,303	(2.9%)	(4.4%)	(1.2%)	(3.5%)
2020	81,255	13,191	86,344	13,133	(5.8%)	(6.0%)	(5.4%)	(8.2%)



Real-time LMP

(Jan-Jun)	Real-Time, Load-Weighted, Average LMP			Year-to-Year Change		
	Average	Median	Standard Deviation	Average	Median	Standard Deviation
1998	\$21.66	\$16.80	\$18.39	NA	NA	NA
1999	\$25.34	\$18.59	\$52.06	17.0%	10.7%	183.1%
2000	\$27.76	\$18.91	\$29.69	9.5%	1.7%	(43.0%)
2001	\$35.27	\$27.88	\$22.12	27.0%	47.4%	(25.5%)
2002	\$25.93	\$20.67	\$14.62	(26.5%)	(25.9%)	(33.9%)
2003	\$44.43	\$37.98	\$28.55	71.4%	83.8%	95.2%
2004	\$47.62	\$43.96	\$23.30	7.2%	15.8%	(18.4%)
2005	\$48.67	\$42.30	\$24.81	2.2%	(3.8%)	6.5%
2006	\$51.83	\$45.79	\$26.54	6.5%	8.3%	7.0%
2007	\$58.32	\$52.52	\$32.39	12.5%	14.7%	22.1%
2008	\$74.77	\$64.26	\$44.25	28.2%	22.4%	36.6%
2009	\$42.48	\$36.95	\$20.61	(43.2%)	(42.5%)	(53.4%)
2010	\$45.75	\$38.78	\$23.60	7.7%	5.0%	14.5%
2011	\$48.47	\$38.63	\$37.59	5.9%	(0.4%)	59.3%
2012	\$31.21	\$28.98	\$17.69	(35.6%)	(25.0%)	(52.9%)
2013	\$37.96	\$33.58	\$18.54	21.6%	15.9%	4.8%
2014	\$69.92	\$42.61	\$103.35	84.2%	26.9%	457.6%
2015	\$42.30	\$30.34	\$37.85	(39.5%)	(28.8%)	(63.4%)
2016	\$27.09	\$23.82	\$14.49	(36.0%)	(21.5%)	(61.7%)
2017	\$29.81	\$26.47	\$12.88	10.1%	11.1%	(11.1%)
2018	\$42.44	\$28.36	\$43.68	42.4%	7.1%	239.1%
2019	\$27.49	\$24.40	\$16.38	(35.2%)	(14.0%)	(62.5%)
2020	\$19.40	\$18.13	\$8.93	(29.4%)	(25.7%)	(45.5%)



Components of real-time LMP

Element	2019 (Jan - Jun)		2020 (Jan - Jun)		Change Percent
	Contribution to LMP	Percent	Contribution to LMP	Percent	
Gas	\$12.45	45.3%	\$8.39	43.3%	(2.0%)
Coal	\$7.30	26.6%	\$5.66	29.1%	2.6%
Ten Percent Adder	\$2.15	7.8%	\$1.58	8.2%	0.3%
VOM	\$1.54	5.6%	\$1.41	7.3%	1.6%
Constraint Violation Adder	\$1.19	4.3%	\$0.77	4.0%	(0.4%)
NA	\$0.10	0.4%	\$0.53	2.7%	2.3%
CO ₂ Cost	\$0.21	0.8%	\$0.36	1.8%	1.1%
Markup	\$1.71	6.2%	\$0.34	1.8%	(4.4%)
LPA Rounding Difference	\$0.19	0.7%	\$0.22	1.1%	0.4%
Increase Generation Adder	\$0.10	0.4%	\$0.06	0.3%	(0.0%)
Scarcity Adder	\$0.25	0.9%	\$0.03	0.2%	(0.7%)
Oil	\$0.02	0.1%	\$0.03	0.1%	0.1%
Ancillary Service Redispatch Cost	\$0.24	0.9%	\$0.03	0.1%	(0.7%)
Opportunity Cost Adder	\$0.04	0.1%	\$0.02	0.1%	(0.0%)
LPA-SCED Differential	\$0.00	0.0%	\$0.01	0.1%	0.0%
NO _x Cost	\$0.01	0.0%	\$0.00	0.0%	(0.0%)
Market-to-Market Adder	\$0.00	0.0%	\$0.00	0.0%	0.0%
Other	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
SO ₂ Cost	\$0.00	0.0%	\$0.00	0.0%	(0.0%)
Uranium	\$0.00	0.0%	\$0.00	0.0%	0.0%
Renewable Energy Credits	(\$0.02)	(0.1%)	(\$0.01)	(0.0%)	0.0%
Landfill Gas	\$0.00	0.0%	(\$0.01)	(0.1%)	(0.1%)
Decrease Generation Adder	(\$0.02)	(0.1%)	(\$0.02)	(0.1%)	(0.1%)
Total	\$27.49	100.0%	\$19.40	100.0%	0.0%



Total congestion offset for ARR holders

Planning Period	Revenue						Pre 2017/2018 (Without Balancing)		2017/2018 (With Balancing)		Post 2017/2018 (With Surplus)	
	ARR Credits	FTR Credits	Day Ahead Congestion	Balancing + M2M Congestion	Total Congestion	Surplus Revenue	Total ARR/FTR Offset	Percent Offset	Current Revenue Received	Percent Offset	New Revenue Received	New Offset
2011/2012	\$512.2	\$249.8	\$1,025.4	(\$275.7)	\$749.7	(\$192.5)	\$762.0	101.6%	\$598.6	79.8%	\$563.0	79.8%
2012/2013	\$349.5	\$181.9	\$904.7	(\$379.9)	\$524.8	(\$292.3)	\$531.4	101.3%	\$275.9	52.6%	\$257.5	52.6%
2013/2014	\$337.7	\$456.4	\$2,231.3	(\$360.6)	\$1,870.6	(\$678.7)	\$794.0	42.4%	\$574.1	30.7%	\$623.1	30.7%
2014/2015	\$482.4	\$404.4	\$1,625.9	(\$268.3)	\$1,357.6	\$139.6	\$886.8	65.3%	\$686.6	50.6%	\$715.0	52.7%
2015/2016	\$635.3	\$223.4	\$1,098.7	(\$147.6)	\$951.1	\$42.5	\$858.8	90.3%	\$744.8	78.3%	\$745.2	78.4%
2016/2017	\$640.0	\$169.1	\$885.7	(\$104.8)	\$780.8	\$72.6	\$809.1	103.6%	\$727.7	93.2%	\$763.8	97.8%
2017/2018	\$427.3	\$294.2	\$1,322.1	(\$129.5)	\$1,192.6	\$371.2	\$721.5	60.5%	\$595.7	50.0%	\$886.5	74.3%
2018/2019	\$529.1	\$130.1	\$832.7	(\$152.6)	\$680.0	\$112.3	\$675.93	99.4%	\$530.8	78.1%	\$626.3	92.1%
2019/2020	\$542.0	\$91.9	\$612.1	(\$160.4)	\$442.7	\$140.7	\$652.54	147.4%	\$492.1	111.2%	\$614.2	138.8%
Total	\$4,455.5	\$2,201.1	\$10,538.4	(\$1,979.5)	\$8,550.0	(\$284.6)	\$6,692.0	78.3%	\$5,226.5	61.1%	\$5,794.8	67.8%

Generation by fuel source

	2019 (Jan - Jun)		2020 (Jan - Jun)		Change in Output
	GWh	Percent	GWh	Percent	
Coal	99,864.3	24.8%	67,845.1	17.6%	(32.1%)
Bituminous	84,501.8	21.0%	62,576.2	16.2%	(25.9%)
Sub Bituminous	11,708.4	2.9%	2,840.9	0.7%	(75.7%)
Other Coal	3,654.1	0.9%	2,428.0	0.6%	(33.6%)
Nuclear	138,609.7	34.4%	136,376.4	35.4%	(1.6%)
Gas	136,016.0	33.8%	151,835.3	39.4%	11.6%
Natural Gas CC	129,375.4	32.1%	143,212.5	37.2%	10.7%
Natural Gas CT	4,187.1	1.0%	5,573.6	1.4%	33.1%
Natural Gas Other Units	1,381.2	0.3%	1,996.8	0.5%	44.6%
Other Gas	1,072.4	0.3%	1,052.5	0.3%	(1.9%)
Hydroelectric	9,817.5	2.4%	9,155.7	2.4%	(6.7%)
Pumped Storage	2,188.8	0.5%	2,221.4	0.6%	1.5%
Run of River	7,002.2	1.7%	6,296.9	1.6%	(10.1%)
Other Hydro	626.6	0.2%	637.4	0.2%	1.7%
Wind	13,644.9	3.4%	14,497.6	3.8%	6.2%
Waste	2,125.6	0.5%	2,145.3	0.6%	0.9%
Oil	907.5	0.2%	931.5	0.2%	2.6%
Heavy Oil	6.5	0.0%	0.0	0.0%	(100.0%)
Light Oil	88.1	0.0%	55.2	0.0%	(37.3%)
Diesel	65.1	0.0%	9.5	0.0%	(85.4%)
Other Oil	747.9	0.2%	866.8	0.2%	15.9%
Solar, Net Energy Metering	1,349.6	0.3%	1,872.7	0.5%	38.8%
Battery	10.9	0.0%	17.1	0.0%	55.9%
Biofuel	592.1	0.1%	438.4	0.1%	(26.0%)
Total	402,938.1	100.0%	385,115.0	100.0%	(4.4%)

RPM reserve margin

	Generation and DR		Forecast		FRR		RPM Peak		Pool Wide	Generation and DR		Reserve Margin		Projected Replacement	
	RPM Committed Less	UCAP (MW)	Peak Load	Peak Load	PRD	Load	Load	IRM	Average	RPM Committed Less	Reserve	in Excess of IRM	ICAP (MW)	Capacity using Cleared	Projected
	Deficiency								EFORd	Deficiency	Margin	Percent		Buy Bids UCAP (MW)	Reserve Margin
01-Jun-16	160,883.3	152,356.6	12,511.6	0.0	139,845.0	16.4%	5.91%	170,988.7	22.3%	5.9%	8,209.2	0.0	22.3%		
01-Jun-17	163,872.0	153,230.1	12,837.5	0.0	140,392.6	16.6%	5.94%	174,220.7	24.1%	7.5%	10,522.9	0.0	24.1%		
01-Jun-18	161,242.6	152,407.9	12,732.9	0.0	139,675.0	16.1%	6.07%	171,662.5	22.9%	6.8%	9,499.8	0.0	22.9%		
01-Jun-19	162,276.1	151,643.5	12,284.2	0.0	139,359.3	16.0%	6.08%	172,781.2	24.0%	8.0%	11,124.4	0.0	24.0%		
01-Jun-20	159,560.4	148,355.3	11,488.3	558.0	136,309.0	15.5%	5.78%	169,348.8	24.2%	8.7%	11,911.9	0.0	24.2%		
01-Jun-21	161,959.4	147,501.6	11,394.3	510.0	135,597.3	15.1%	5.56%	171,494.5	26.5%	11.4%	15,422.0	1,232.8	25.5%		

- **PJM excess reserves at 06.01.2020: 11,911.9 MW**
- **PJM excess reserves at 06.01.2021: 14,189.2 MW**
 - **Expected, net of projected replacement**

Total price: January through June, 2019 and 2020

Category	Jan-Jun 2019 \$/MWh	Jan-Jun 2019 (\$ Millions)	Jan-Jun 2019 Percent of Total	Jan-Jun 2020 \$/MWh	Jan-Jun 2020 (\$ Millions)	Jan-Jun 2020 Percent of Total	Percent Change
Load Weighted Energy	\$27.49	\$10,302	51.7%	\$19.40	\$6,884	45.1%	(29.4%)
Capacity	\$13.81	\$5,175	26.0%	\$9.83	\$3,487	22.8%	(28.8%)
Capacity	\$13.78	\$5,164	25.9%	\$9.83	\$3,487	22.8%	(28.7%)
Capacity (FRR)	\$0.00	\$0	0.0%	\$0.00	\$0	0.0%	0.0%
Capacity (RMR)	\$0.03	\$12	0.1%	\$0.00	\$0	0.0%	(100.0%)
Transmission	\$10.55	\$3,954	19.8%	\$12.48	\$4,428	29.0%	18.3%
Transmission Service Charges	\$9.92	\$3,717	18.7%	\$11.78	\$4,182	27.4%	18.8%
Transmission Enhancement Cost Recovery	\$0.54	\$204	1.0%	\$0.60	\$214	1.4%	11.2%
Transmission Owner (Schedule 1A)	\$0.09	\$33	0.2%	\$0.09	\$32	0.2%	2.7%
Transmission Seams Elimination Cost Assignment (SECA)	\$0.00	\$0	0.0%	\$0.00	\$0	0.0%	0.0%
Transmission Facility Charges	\$0.00	\$0	0.0%	\$0.00	\$0	0.0%	0.0%
Ancillary	\$0.69	\$259	1.3%	\$0.72	\$254	1.7%	3.6%
Reactive	\$0.44	\$166	0.8%	\$0.50	\$178	1.2%	12.9%
Regulation	\$0.11	\$40	0.2%	\$0.09	\$34	0.2%	(10.4%)
Black Start	\$0.09	\$32	0.2%	\$0.09	\$33	0.2%	9.8%
Synchronized Reserves	\$0.04	\$14	0.1%	\$0.02	\$5	0.0%	(59.0%)
Non-Synchronized Reserves	\$0.01	\$5	0.0%	\$0.01	\$2	0.0%	(48.5%)
Day Ahead Scheduling Reserve (DASR)	\$0.00	\$2	0.0%	\$0.00	\$1	0.0%	(22.4%)
Administration	\$0.51	\$192	1.0%	\$0.54	\$192	1.3%	6.0%
PJM Administrative Fees	\$0.48	\$179	0.9%	\$0.50	\$179	1.2%	6.0%
NERC/RFC	\$0.03	\$12	0.1%	\$0.03	\$12	0.1%	7.5%
RTO Startup and Expansion	\$0.00	\$1	0.0%	\$0.00	\$1	0.0%	(9.7%)
Energy Uplift (Operating Reserves)	\$0.10	\$36	0.2%	\$0.06	\$23	0.1%	(34.0%)
Demand Response	\$0.00	\$1	0.0%	\$0.00	\$1	0.0%	(11.5%)
Load Response	\$0.00	\$1	0.0%	\$0.00	\$1	0.0%	(11.5%)
Emergency Load Response	\$0.00	\$0	0.0%	\$0.00	\$0	0.0%	0.0%
Emergency Energy	\$0.00	\$0	0.0%	\$0.00	\$0	0.0%	0.0%
Total Price	\$53.14	\$19,918	100.0%	\$43.03	\$15,268	100.0%	(19.0%)
Total Load (GWh)	374,789			354,842			(5.3%)
Total Billing (\$ Billions)	\$19.92			\$15.27			(23.3%)

PJM Markets

- **Competitive wholesale power markets work.**
 - The goal is power at lowest possible cost.
- **PJM energy market needs more effective market power mitigation.**
- **PJM capacity market needs to be improved.**
 - Market power in the last base auction.
- **Markets are good for all unit types.**
- **Markets are good for renewables.**
- **Markets create incentives for creative responses.**
- **Markets preferred to planning.**
- **Market alternative to subsidies to address carbon:**
 - Carbon price
 - RGGI
- **Markets only work with clear rules**



MOPR Order

- **Order defines boundary between federal and state jurisdiction for PJM wholesale power market.**
- **States have authority over generation.**
- **MOPR is not about market power.**
- **MOPR is about defining competitive markets.**
- **Definition of competitive offers in the capacity market**
 - **Net CONE**
 - **Net ACR**
- **MOPR Order versus Sustainable Market Rule (SMR)**
 - **Net ACR**
- **History of MOPR**
 - **NJ**
 - **MD**
 - **Hughes vs Talen Energy Marketing decision (2016)**



MOPR Order

- **State subsidies are distinguishing element.**
- **Significant exemptions for existing resource categories:**
 - **Renewables**
 - **Resources under RPS (PA Tier II Resources)**
 - **Demand side**
 - **Self supply**
- **Offer floors**
 - **Existing resources subject to MOPR**
 - **New resources subject to MOPR**
- **Double payment issue**
 - **Subsidized resources that do not clear capacity market**



Impacts of MOPR Order

- **Detailed analysis/modeling shows no impact on capacity prices in upcoming capacity auction**
- **Capacity market auctions for 2022/2023; 2023/2024; 2024/2025**
- **Existing nuclear units with subsidies are expected to clear**
- **Existing renewable resources are exempt**
- **Existing resources with RPS qualifications are exempt**
- **Existing self supply resources are exempt**
- **Existing demand resources are exempt**
- **Estimates of price increase are incorrect:**
 - **Commissioner Glick's estimate**
 - **Grid Strategies' estimate**



Long term impacts of MOPR Order

- **Will renewable supply be competitive?**
- **Renewables contribution to capacity/reliability.**
 - **Derates**
 - **ELCC**
- **Will states implement carbon pricing?**
- **Least cost approach to low carbon**
 - **Option: Markets with MOPR**
 - **Option: Markets with SMR**
 - **Option: Markets with carbon price**
 - **Option: Markets plus targeted RECs/subsidies**
 - **Option: FRR instead of markets**



CONE offer floors

- **Default net CONE values are relatively low for combined cycle plants and high for coal and nuclear plants.**
- **Default net CONE values for onshore and offshore wind, and for solar, are high enough that offers based on these values would be unlikely to clear in a capacity auction, based on the clearing prices in recent capacity auctions.**
- **Unit specific values may vary significantly from these values.**
- **Unit specific values for renewables lower than default.**



ACR offer floors

- **Default net ACR values, excluding major maintenance, for all existing technologies are close to zero, with the exception of coal and diesel and single unit nuclear.**
- **Based on the net ACR values and the clearing prices in recent capacity auctions, all existing technologies except single unit nuclear plants would be expected to clear if subject to a net ACR MOPR price floor.**
- **Unit specific values may vary significantly from these values.**



FRR option

- **In order to create a new FRR service area, a utility must elect the FRR option consistent with the PJM Market Rules. The utility can be required to make the FRR election by the state in which the FRR exists.**
- **Regardless of the existence of retail choice, the FRR entity must include all load in the FRR service area for all LSEs and must provide adequate capacity to meet that load.**
- **LSEs are required to pay the FRR entity based on a state mandated compensation mechanism or based on the rest of RTO capacity price in the absence of such a mechanism.**



FRR option

- **Generators in the FRR area are not required to participate.**
- **The creation of an FRR is likely to increase payments for capacity by customers.**
- **The increase in payments by customers would be larger with additional subsidies.**
- **Market power is an issue in an FRR.**
- **The actual price for capacity and any actual subsidies would be the result of a negotiation between generation owners and the state.**
- **FRR option replaces competitive markets with an undefined weak form of cost of service regulation.**
- **No market power mitigation rules.**
- **No rules about competition or relative costs or goals.**
- **Details would be defined by each state.**



IMM Analysis of FRR Options

- **ComEd**
- **Maryland**
- **New Jersey**
- **Ohio**
- **Virginia (forthcoming)**
- **Washington, DC (forthcoming)**
- **Additional LDAs (forthcoming)**



IMM recommendations: Transmission

- **Increase the role of competition in transmission consistent with Order 1000**
 - **Eliminate the exemption of supplemental projects**
 - **Eliminate the exemption of end of life projects**
 - **Implement robust evaluation of competing cost containment project and cost of service project proposals**
- **The rules governing cost/benefit analysis for evaluation of transmission projects should be modified to include all costs in all zones.**



Market power issues

- **Energy**
 - Application of market power mitigation rules flawed
 - MMU filings on MBR
 - Mark up; inflexible parameters
 - ARR/FTR design flaws
- **Capacity**
 - Market power through inflated offer cap
 - Over procurement
 - Definition of PAIs
 - MOPR
 - ELCC
- **Ancillary Services**
 - Regulation market design flawed
- **Transmission**
 - Inadequate competition



All in costs of wholesale power: Issues

- **Energy**
 - **ORDC; Fast start pricing**
 - **Uplift; inflexible parameters**
 - **Carbon price; RPS**
 - **ARR/FTR**
- **Capacity**
 - **Market power**
 - **Over procurement**
 - **Subsidies**
 - **MOPR**
 - **FRR**
 - **ELCC**
- **Ancillary Services**
 - **Regulation**
- **Transmission**



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