

### FTR Credit Requirements

### Prevailing Flow Paths Affected by Transmission System Upgrades



Hal Loomis Manager, Credit Market Implementation Committee November 8, 2017



#### Credit Risk Exposure – Issue Description

- FTR credit requirements for prevailing paths are currently based on the weighted historical congestion on those paths for the past three years.
- Transmission system upgrades may decrease future congestion thus decreasing the value of primarily prevailing flow FTRs in the vicinity of the transmission system upgrade.
- PJM's FTR bid and cleared credit requirements should incorporate consideration of the projected congestion impact to FTRs of major transmission system upgrades, in order to mitigate the associated default exposure to PJM's members.





PJM is proposing to use results from PJM's PROMOD model simulations of major transmission system upgrades, applied to historical path congestion amounts, to establish FTR bid and cleared credit requirements for paths whose congestion levels are projected to be negatively impacted by modeled transmission system changes effective for any portion of the FTR's term.

The Credit Subcommittee has endorsed the proposal with 72% in support and 68% indicating preference for the proposal over the status quo. 117 Members representing all sectors participated in the poll.



- The fundamental credit calculation framework would not change.
- FTR credit requirements would continue to be based on FTR price, historical path congestion amounts, and any applicable undiversified adder(s) for all FTRs on both prevailing flow and counterflow paths
  - FTRs that are <u>not</u> negatively affected by a modeled transmission system change would continue to utilize actual historical values
  - FTRs that <u>are</u> negatively affected by a modeled transmission system change would utilize an adjusted historical value in the calculation
    - The historical congestion value used for each path would be the actual historic value adjusted for any PROMOD-calculated reduction in congestion value



### Transmission System Upgrades

- Criterion for upgrades for which PROMOD congestion simulations would be run:
  - Transmission upgrades, individually or as a cluster, having 10% or more impact on the congestion on any individual constraint or cluster of constraints with congestion of \$5MM or more ("low frequency-high impact")
- For 2017/2018, only 3 of the 22 transmission system upgrades met this criterion
  - Rebuild existing Graceton-Bagley 230kV single line to double circuit 230kV line
  - Rebuild existing Bagley-Raphael Road 230kV single line to double circuit 230kV line
  - Construct a new Byron-Wayne 345kV circuit

### Example – Paths Affected by Sample Upgrade

Affected Paths	Actual Historical Congestion (A)	PROMOD Congestion Change (B)	Adjusted Congestion From Simulation C = (A - B)	Adjusted Congestion Used in New Credit Requirement D = lower of A or C
Path A	\$16,548	(\$9,930)	\$6,618	\$6,618
Path B	(\$17,430)	\$2,209	<mark>(</mark> \$15,521) <sup>(1)</sup>	(\$17,430) <sup>(1)</sup>
Path C	\$89,157	(\$16,362)	\$72,795	\$72,795
Path D	(\$882)	(\$7,722)	(\$8,604)	(\$8,604)

(1) Adjusted congestion is only used if it is less than actual historical congestion; otherwise, actual historical congestion is used

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### Examples – Modified Credit Requirements

FTR	Adjusted Congestion Used in New Credit Requirement (D)	17/20 LTFTR Auction Clearing Price (E)	Profit (Loss) With Projected Congestion F = (D – E)	Original Credit Requirement G = E – (0.9 x A)	New Credit Requirement H = E – (0.9 x D)
Path A	\$6,618	\$10,751	(\$4,133)	_ (1)	\$4,795 <sup>(2)</sup>
Path B	(\$17,430)	(\$12,347)	(\$2,875)	\$6,826 <sup>(3)</sup>	\$6,826 <sup>(3)</sup>
Path C	\$72,795	\$61,628	\$11,167	_ (1)	_ (1)
Path D	(\$8,604)	<b>(</b> \$1,596)	(\$7,008)	_ (1)	\$7,868 <sup>(2)</sup>

(1) Individual FTR credit requirements can be negative, but whole month credit requirement cannot be less than zero

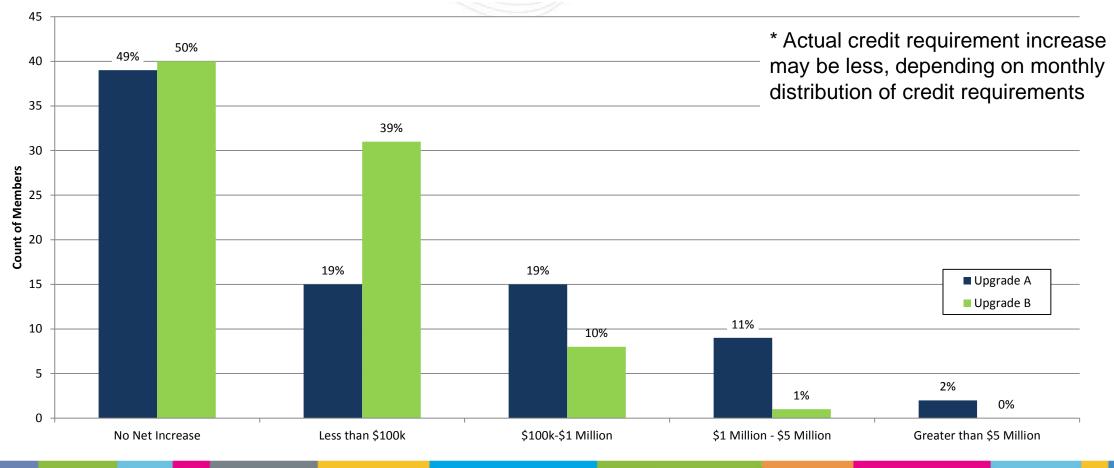
(2) Adjusted congestion is used because it is less than actual historical congestion; therefore, the credit requirement increases

(3) Adjusted congestion is not used because it is not less than actual historical congestion; therefore, the credit requirement does not change



### Analysis of Sample Transmission Upgrades

Maximum Change in Credit Requirement 15/18, 16/19, and 17/20 Long Term FTRs Upgrade A and B





### Implementation Description and Timing

- Proposed implementation time: Spring 2018
  - Coincident with the annual historical value update
  - Historical values to be updated annually thereafter, and may also be adjusted for newlyidentified significant transmission changes
- Effective for 2018-2019 annual FTR auction and all subsequent auctions
  - Long-term, annual, balance-of-planning-period (monthly)
- Applied to existing positions at the time of the annual update of historical prices
  - Special transition plan would mitigate impact to members



- Members with credit shortfall upon implementation will be restricted in their FTR transaction ability during a transitional cure period
  - Shortfall in FTR credit allocation will not be an event of default during transitional cure period
  - Transitional cure period will be 12 months in duration
  - Members will only be permitted to enter into FTR transactions that reduce credit requirements
    - e.g. sale of an FTR, if sale would reduce credit requirements
  - All other credit-screened transactions prohibited
    - INC, DEC, Up-to congestion, Export, and RPM transactions
- Collateral returns not allowed until credit shortfall is cured
- Members may cure their shortfall at any time through provision of sufficient collateral
  - Full transaction rights would be restored upon cure

Next Steps

• Target stakeholder timeline:

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- Credit Subcommittee:
- Market Implementation Committee:
- Markets and Reliability Committee:
- Members Committee:
- FERC Filing

Endorsement October 2017

First read October 11, 2017; Endorsement November 8, 2017

First read October 26, 2017; Endorsement December 7, 2017

Endorsement December 7, 2017

December 2017



## Appendix

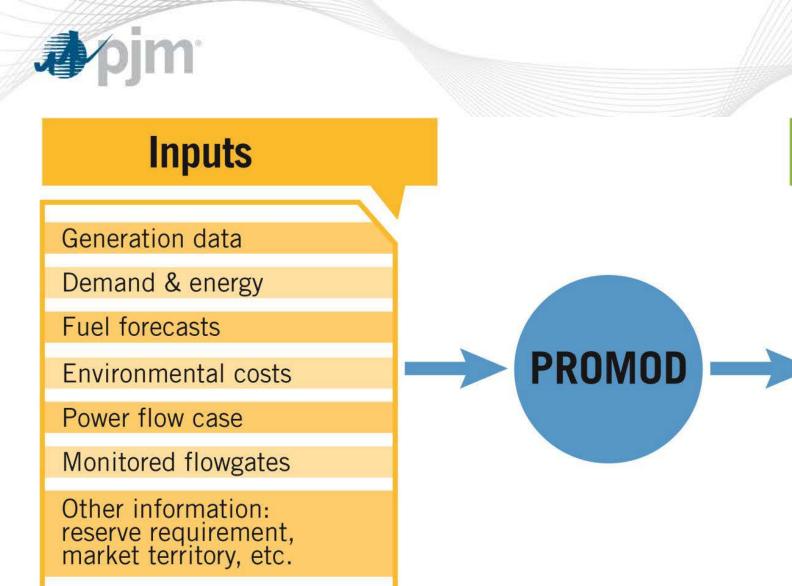
### Credit Subcommittee Poll Results PROMOD Background and Simulation Reasonableness



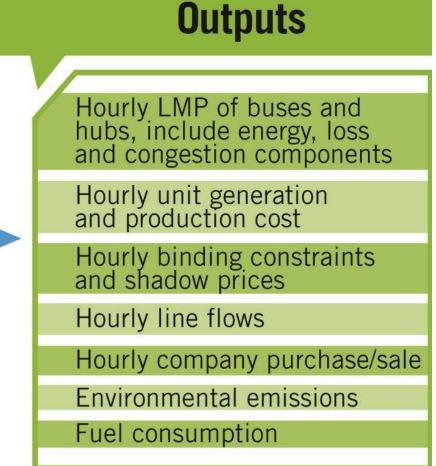
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### Credit Subcommittee Poll Results

- 117 members from all sectors participated in the Credit Subcommittee poll
- 72% support the proposal
- 68% prefer the proposal over the status quo
- 73% support posting the credit calculator before the auctions
  - The calculator would include the PROMOD-adjusted historical values used in credit calculations
- 89% support applying the proposed new rules to existing FTRs and utilizing the transition plan for portfolios with a credit shortfall
- 84% support freezing all credit-screened transactions for members with credit shortfall during the transition period
  - Including all INC, DEC, up-to-congestion, and export transactions



### **PROMOD** Inputs/Outputs



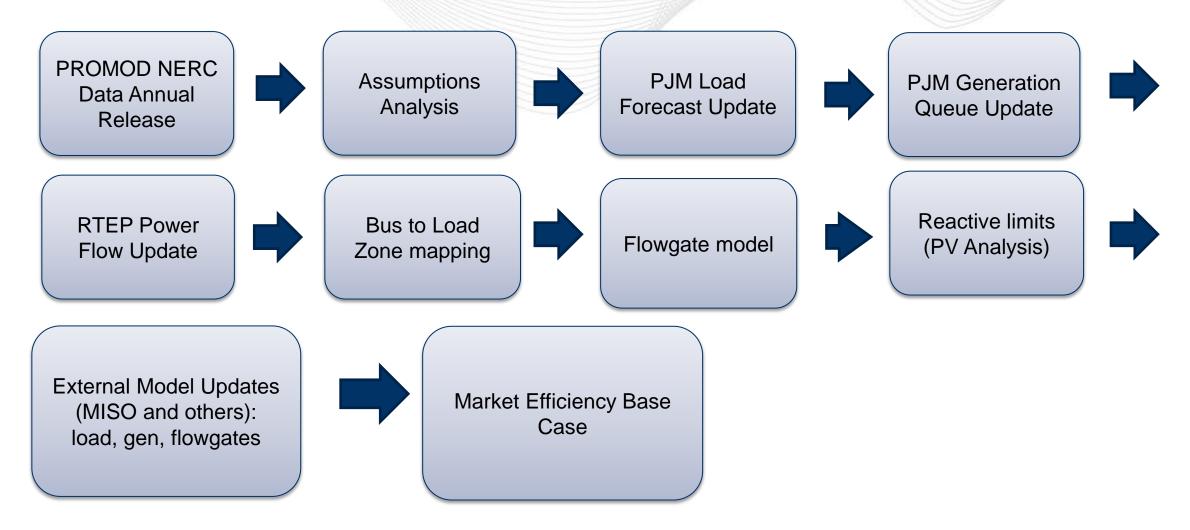


### Overview of Market Efficiency Base Case Inputs

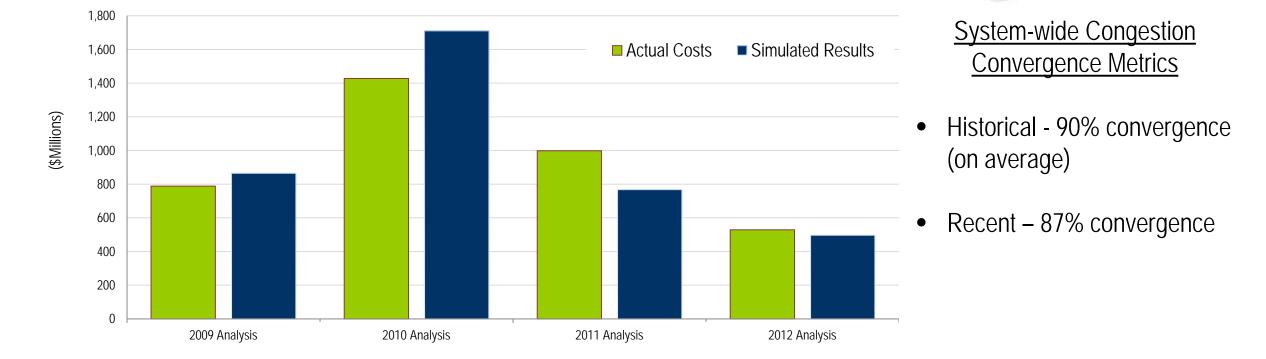
PROMOD SCED Simulation			Interregional Inputs	Reporting Inputs
Generation Expansion Plan (ISA/FSA)	Demand Response Forecast		MISO and NY Updates: GenExp,	RTO Weighted Average Cost of Capital
Intermittent resource hourly shapes	Transmission Topology (As-Is, RTEP)	load forecast, wind profiles, major upgrades, flowgates, transactions with SPP/MRO, imports Canada		RTO Fixed Carrying Charge Rate
Fuel Price Forecast: Natural Gas,Coal, Oil-H, Oil-L	Topology Mapping: Bus-Area, BusLoad-Demand, Gen-Bus (As-Is, RTEP)			ARR Source Sink Paths and Cleared MW
Emissions Price Forecast: CO2 (National, RGGI), SO2, Nox (seasonal,annual)	Reactive Interface PV Analysis		Pool Interaction Modeling: M2M flowgates, pseudo-ties, DC	Project Cost and ISD
Demand Forecast: Annual Peak Load and Energy, Hourly shapes	Monitored lines and contingencies, interfaces and nomograms, PARs		schedules, hurdle rates, import/export limits, inactive pools	



### Market Efficiency Inputs Update Process







# 2017 PROMOD (Jan - Aug)2017 Actual Total Congestion (Jan - Aug)\$ 311 MM\$ 356.5 MM

**PROMOD Benchmarking** 



### 2017/2018 RTEP Impacts to FTR Paths

FTR Path		Impacted by	Historical Value		
Source	Sink	RTEP?	(50/30/20)	PROMOD Value	FTR Market Price
WHUB	BGE	Y	\$ 71,394	\$ 24,090	\$ 24,440
COMED	BGE	Y	\$ 116,508	\$ 39,157	\$ 47,304
DOM	BGE	Y	\$ 42,048	\$ 17,782	\$ 18,133
PPL	RECO	Ν	\$ 14,716	\$ 14,016	\$ 12,789
PECO	PPL	Ν	\$ 3,066	\$ 3,153	\$ 2,978

Paths	Historical Value to FTR Market Price Ratio	PROMOD to FTR Market Price Ratio
Impacted by RTEP	257%	93%
Not impacted by RTEP	113%	109%