

# MN8 feedback on select RBP design components

| # | Component          | Position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Considerations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 1 | Procurement target | <ul style="list-style-type: none"><li>EDCs bid in demand and max willingness-to-pay by contract start date</li><li>Native shortfall also bid in and shared pro rata among EDCs, defined as the difference between 27/28 cleared supply and the MW corresponding to Point A on the 27/28 demand curve</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"><li>EDCs should be able to reflect different willingness-to-pay, especially if certain loads want to use RBP to procure for earlier in-service years</li><li>Because PJM is proposing to block RBA until 2030/31, and because PJM does not want to subject native load to C&amp;M, RBP should also procure for the native shortfall</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2 | Clearing           | <ul style="list-style-type: none"><li>Sequential, starting with earlier in-service years subject to RTO-wide bid in demand</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3 | Supply offers      | <p>UCAP</p> <ul style="list-style-type: none"><li>Option 1: Resources bid a single price in \$/MW UCAP-Day and leave volume unspecified. Resources are paid based on UCAP delivered that moves with class ELCC, but do not commit to a fixed level of UCAP.</li><li>Option 2: Resources bid a single price in \$/MW UCAP-Day and specify volume based on a fixed class ELCC forecast determined by PJM before the RBP. For a DY, UCAP is the product of the resource's nameplate MW times the fixed ELCC for that DY times its resource performance adjustment. Resources incur penalties for UCAP shortfalls.</li></ul> <p>In-Service Year</p> <ul style="list-style-type: none"><li>Consider allowing suppliers to submit multiple offers for the same project (e.g., if Offer A is selected at a higher price and earlier in service year, remove Offer B for a lower price and later in service year).</li></ul> | <p>UCAP</p> <ul style="list-style-type: none"><li>RBP is a one-time procurement meant to add capacity to get through the near-to mid-term reliability risk period</li><li>RBP should be designed for effectiveness given commercial realities and constraints</li><li>Option 1 ensures that sellers who don't perceive material regulatory uncertainty on accreditation can offer at the most competitive price</li><li>Option 2 allows suppliers to manage regulatory uncertainty around accreditation</li><li>Offering both options allows resources to effectively manage their particular set of risks - e.g., BESS to manage regulatory uncertainty around class ELCCs; gas to manage unit specific performance risk in a world with material uncertainty around what happens during PAIs given midstream delivery risks</li></ul> <p>In-Service Year</p> <ul style="list-style-type: none"><li>Multiple offers will allow suppliers to offer different project terms and give buyers more options.</li></ul> |
| 4 | Substitutions      | <ul style="list-style-type: none"><li>When price collar is in effect, eligible resources can be substituted in</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"><li>This may help suppliers manage project attrition risk</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5 | Supply collateral  | <ul style="list-style-type: none"><li>~\$130,000/MW pre-COD posted at clearing, dropping to ~\$65,000/MW post-COD</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"><li>While above standard industry conventions, these levels should remain acceptable to most counterparties</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 6 | Deliverability     | <ul style="list-style-type: none"><li>Only fully deliverable MWs are paid for RBP and qualify for RPM UCAP (including BYONC)</li><li>All resources eligible to seek Interim Deliverability</li><li>No RBP penalties for Deliverability Network Upgrade delays</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |