

Market Participant Minimum Capitalization Proposed Solution Packages

Ryan Jones Senior Manager, Underwriting

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Comparison of RMC Minimum Capitalization Packages

			Alternative Security	Meet	Doesn't Meet	Collateral Required (000s)
Status	FTR	TNW \$1MM or TA \$10MM	\$1M	050/	5%	\$23,500
Quo	Other	TNW \$500,000 or TA \$5MM	\$500k	95%		
Packago		TNW Must Be > \$0 and				\$188,500
Package D	FTR	TNW \$2MM or TA \$10MM (FTR)	\$2-3MM	83%	17%	
	Other	\$1MM per Mkt or TA \$5MM (Others)	\$1M per Mkt, Max \$3MM			
		TNW Must Be > \$0 and			17%	\$145,476
Package	FTR	TNW \$2MM or TA \$10MM	FTR \$2MM – TNW	83%		
G YR 1	Other	TNW \$1MM or TA \$5MM with TNW adjustment \$200,000 per/yr for 5 yrs	Other \$1MM – TNW			
Package G YR 6	All	TNW Must Be > \$0 and TNW \$2MM or TA \$10MM w/TNW adjustment 3% per year	\$2MM	80%	20%	\$316,000
Package	FTR/V	irtuals – Status Quo	FTR 1MM			
C	Others TNW > max(500k, 2* highest weekly bill) or TA > max (5MM, 10* highest weekly bill)		Other \$500K	84%	16%	\$75,000

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Inflation Indices for the past 20 years

	Consumer Price Index – Urban	Handy_Whitman	Producer Price Index – Elec	Producer Price Index – Industry	Personal Consumption Expenditures
2006-2010 Average	2.2%	4.2%	4.1%	3.2%	2.0%
2011-2015 Average	1.7%	3.0%	2.0%	1.2%	1.5%
2016-2020 Average	1.8%	2.2%	0.6%	0.8%	1.5%
2021-2025 Average	4.4%	7.3%	5.6%	5.6%	3.8%
10 Year Average (2016-2025)	3.1%	4.7%	3.1%	3.2%	2.6%
20 Year Average (2006-2025)	2.5%	4.2%	3.1%	2.7%	2.2%

PJM's package includes annually adjusting TNW by a fixed 3% after Year 6

The 3% fixed number:

- Closely aligns with the 10-year and 20-year averages
- Provides a stable, balanced estimate that avoids extremes
 - Smooths out cyclical highs and lows

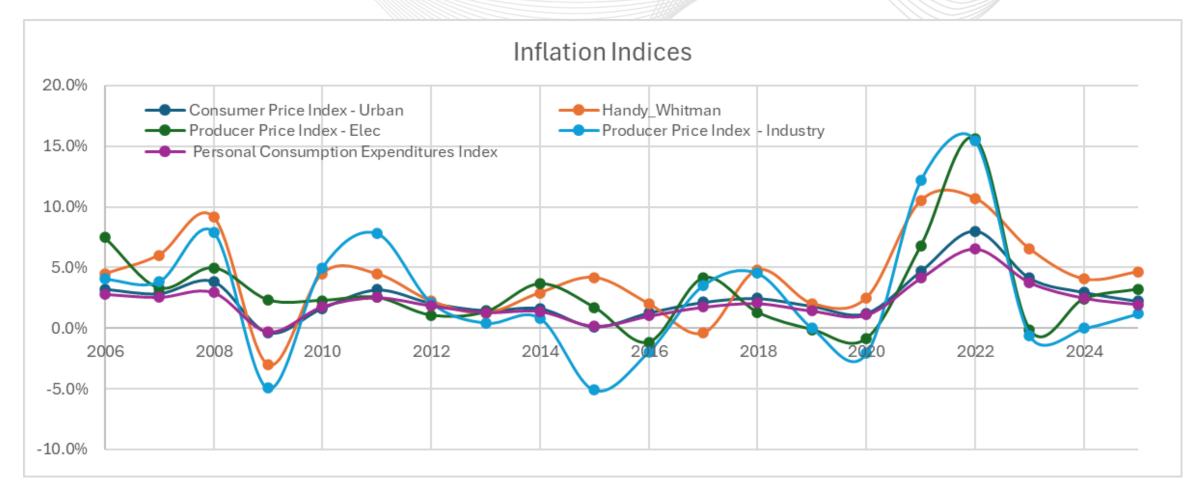


Appendix

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Inflation Indices 2006-2025





Comparison of Minimum Capitalization RMC Packages

				Proposed Solution:						
	Status Quo			Package C		Package D				
	TNW \$1MM or TA \$10MM (FTR) TNW \$500,000 or TA \$5MM (Others)			FTR and Virtuals – Status Quo All others: TNW > max(500k, 2* highest weekly bill) or TA > max(5MM, 10* highest weekly bill)			TNW Must Be > \$0 and TNW \$2MM or TA \$10MM (FTR) TNW \$1MM per Mkt or TA \$5MM (Others)			
		Alternative Security FTR \$1M/ Other – \$500K			Alternative Security – FTR 1MM Other - \$500K			Alternate Security FTR \$2–3MM/ Other – \$1M per Mkt, Max \$3MM		
	Total	Doesn't Meet Collateral Required (000s)		Doesn't Meet Collateral Required (000s)		Doesn't Meet # Collateral Requipment Doesn't Meet % (000s)		Collateral Required (000s)		
		#	%		#	%		#	%	
Generation Owner/ Transmission Owner	359	12	2%	\$6,500	43	5%	\$25,500	43	5%	\$61,500
Load Serving Entity	103	8	1%	\$4,500	35	4%	\$19,500	38	5%	\$63,500
Curtailment Service Provider	25	6	1%	\$3,000	12	2%	\$7,000	14	1%	\$11,000
Financial Trader	129	10	1%	\$7,000	12	2%	\$16,500	13	2%	\$7,000
Power Marketer	134	4	0%	\$2,500	20	3%	\$11,500	19	2%	\$31,500
Other	48	0	0%	\$0	4	1%	\$4,000	6	1%	\$14,000
Total	798	40	5%	\$23,500	127	16%	\$75,000	133	16%	\$188,500



Comparison of Minimum Capitalization RMC Packages

		Status Quo			Package G Yr 1			Package G Year 6			
			TNW \$1MM or TA \$10MM (FTR) TNW \$500,000 or TA \$5MM (Others)			TNW Must Be > \$0 and TNW \$2MM or TA \$10MM (FTR) TNW \$1MM or TA \$5MM (Others w/TNW adjustment \$200,000 per/yr. for 5 yrs.			TNW Must Be > \$0 and TNW \$2MM or TA \$10MM (All) with Fixed 3% adjustment per year		
		Alternative Security – FTR \$1MM Other – \$500K			Alternative Security – FTR \$2MM Other – \$1MM			Alternative Security – \$2MM			
Total		Doesn't	Meet	Collateral Required (000s)			Collateral Required (000s)		Doesn't Meet # Collateral Require (000s)		
		#	%		#	%		#	%		
Generation Owner/ Transmission Owner	359	12	2%	\$6,500	43	5%	\$47,430	44	6%	\$88,000	
Load Serving Entity	103	8	1%	\$4,500	36	5%	\$38,821	42	5%	\$84,000	
Curtailment Service Provider	25	6	1%	\$3,000	14	2%	\$11,734	16	2%	\$32,000	
Financial Trader	129	10	1%	\$7,000	17	2%	\$20,059	26	3%	\$52,000	
Power Marketer	134	4	1%	\$2,500	18	2%	\$19,364	24	3%	\$48,000	
Other	48	0	0	\$0	5	0%	\$8,068	6	1%	\$12,000	
Total	798	40	5%	\$23,500	133	17%	\$145,477	158	20%	\$316,000	

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ISOs/RTOs Minimum Capitalization Comparison

RTO/ISO	Participant Type	Tangible Net Worth (TNW)	Tangible Assets (TA)
PJM	FTR	>\$1M	>\$10M
	Others	>\$500k	>\$5M
SPP	FTR	>\$10M	>\$20M
	Others	>\$1M	>\$10M
MISO	FTR	>\$1M	>\$10M
	Others	>\$500K	>\$5M
CAISO	All Market Participants	>\$1M	>\$10M
ERCOT	FTR	>\$1M	≥\$10M
	Others	>\$500k	>\$5M
ISO-NE	All Market Participants	>\$1M	>\$10M
NYISO	All Market Participants	>\$1M	>\$10M



PJM's Market Eligibility Requirements

Per Tariff, Attachment Section III, before participants are eligible to transact in the PJM Markets and as a condition to continued eligibility to transact in the PJM markets, participants must demonstrate they meet:

- 1 Market Participant Eligibility Requirements
 - **met through** submission of an Annual Officer Certification Form demonstrating they can meet the definition of "appropriate person," "eligible contract participant," or an entity that generates, transmits or distributes electric energy, to ensure minimum criteria are in place
- 2 Risk Management and Verification –

met through the submission of current written risk policies and procedures

- **Minimum Capitalization Requirements –** Participants must meet certain financial thresholds or provide alternative forms of security to demonstrate their ability to fulfill financial obligations.
 - Tangible Net Worth:
 Maintaining a minimum tangible net worth greater than \$1 million for FTRs and greater than \$500K for all other Market Participants
- Tangible Assets: Having greater than \$10 million in tangible assets for FTRs and greater than \$5 million in tangible assets for all other Market Participants
- Alternative Security: If a participant doesn't meet the tangible asset or tangible net worth requirements, they can post a letter of credit, cash deposit, surety bond or parental guaranty from a guarantor that meets the above min cap thresholds. Such security is restricted collateral and may not be used to support market activity.



Facilitator:

Susan McGill, Susan.McGill@pjm.com

Secretary:

Julia Spatafore, Julia.Spatafore@pjm.com

SME:

Ryan Jones, Ryan.Jones@pjm.com

Market Participant Minimum Capitalization Proposed Solution Packages



Member Hotline

(610) 666 - 8980

(866) 400 - 8980

custsvc@pjm.com



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