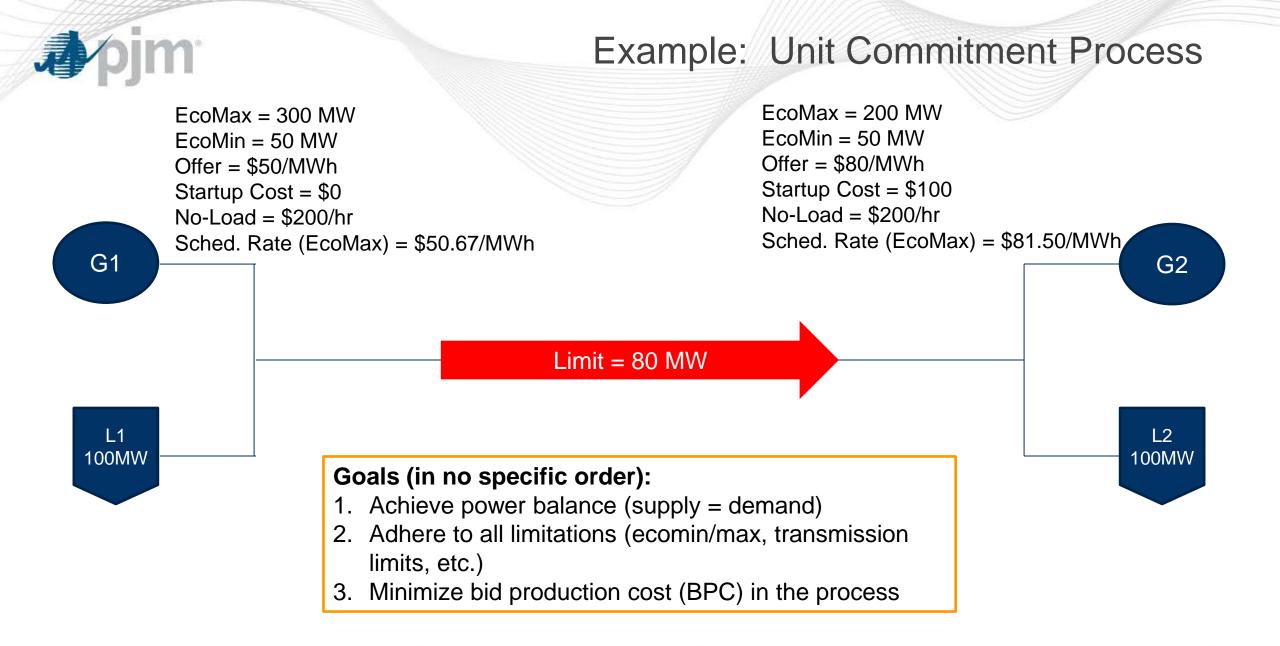
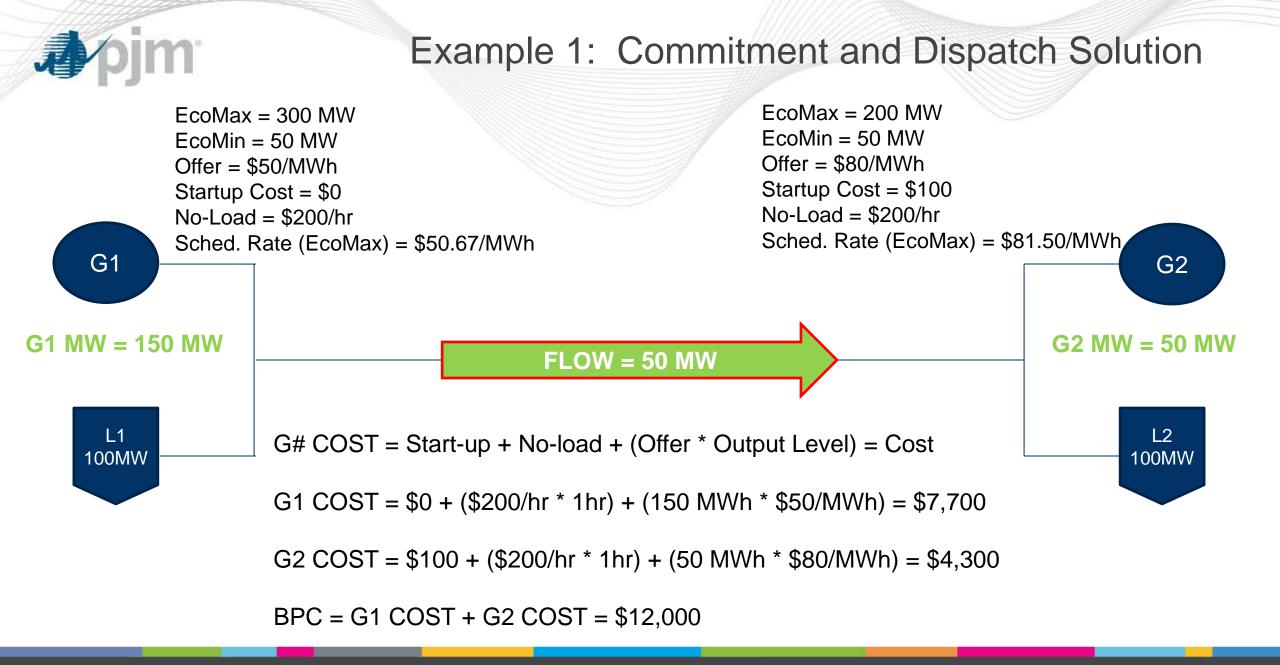


Gaps in Current Pricing Methodology

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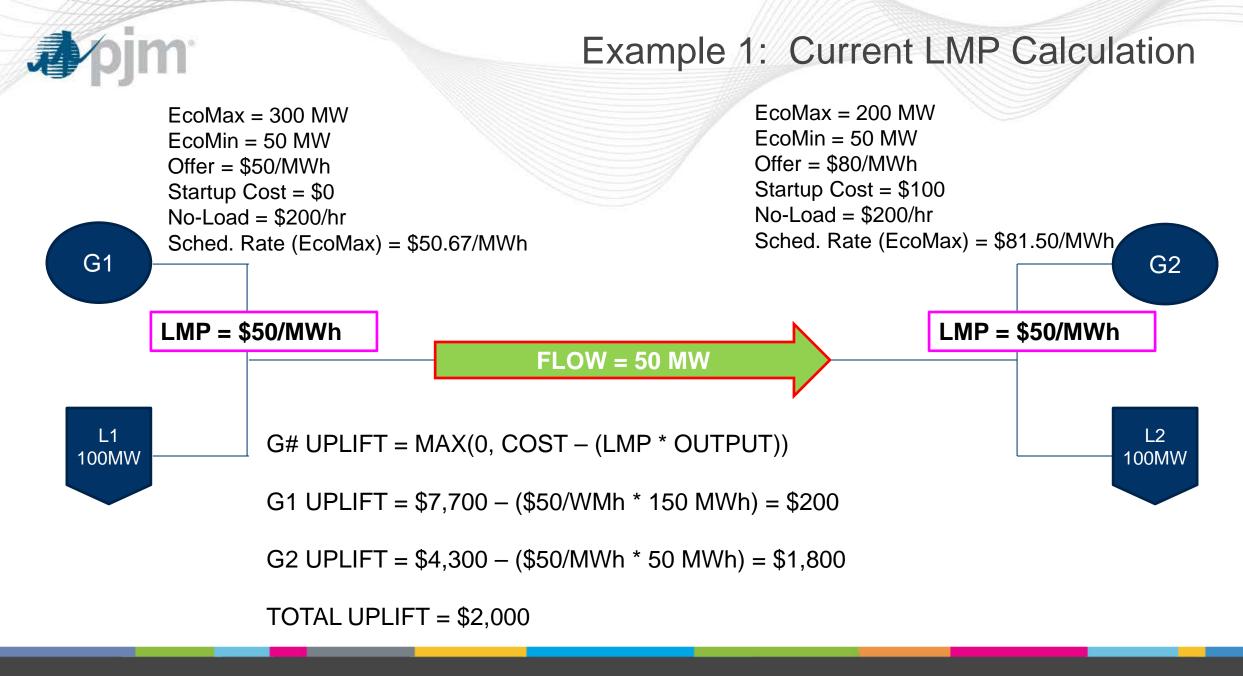
- There are times when the LMP is unable to send market signals that support the efficient commitment and dispatch of the system
- When this occurs, market participants may have the incentive to deviate from PJM's instructions
- We use uplift (make whole and LOC) to remove the incentive for generation resources to deviate from dispatch
- PJM believes all known pricing methods require some level of uplift to support commitment and dispatch instructions







- If the limit on the line were 100 MW or greater only G1 would be needed to serve all load
 - LMP = \$50/MWh across the system
- G2 has an EcoMin = 50 MW which must be adhered to in the commitment/dispatch process
- Because G2 is committed at 50 MW, G1's output is reduced to 150 MW to maintain power balance

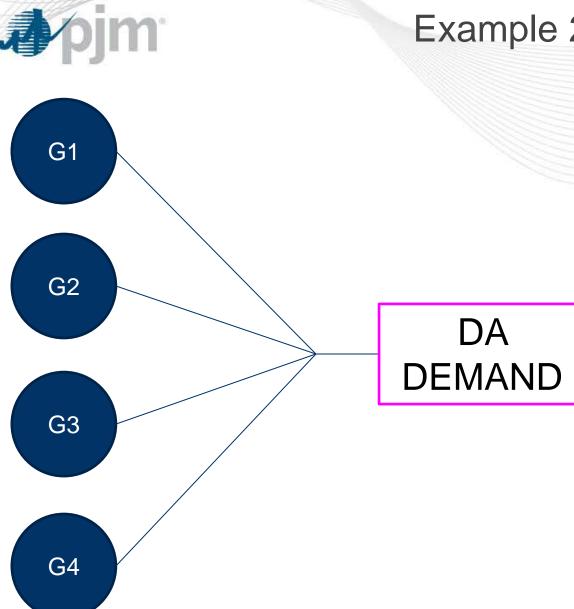




- The next MW of load would be serve by G1 thus the LMP = \$50/MWh
- The transmission constraint is not binding so prices are uniform across the system
- Prices do not reflect G2 as being needed
- The need for G2 is reflected through uplift payments which are not transparent and shift costs

Example 1: Uplift Allocation

- Assume this scenario occurs in the Day-ahead Market
 - DA Uplift is allocated to all withdrawal transactions on a pro-rata basis
 - Cleared DA demand, DECs, price-sensitive demand, exports
 - L1 and L2 will both be allocated a pro-rata share of the cost to make units G1 and G2 whole (\$1,000 each)
 - L1 and L2 pay the same price despite the fact that G2 is needed to serve load at L2 and not L1



Example 2: Impacts on Balancing Settlement

- Units G1-G4 able to be scheduled to serve load in the DAM
- DA Demand = 550 MW
- G1 and G2 are flexible
- G3 and G4 are inflexible



Example 2: Generator Offer Data

G1 Unit Parameters

EcoMax = 300 MW EcoMin = 100 MW Offer @ EcoMax = \$60/MWh Offer @ EcoMin = \$40/MWh Startup Cost = \$0 No-Load = \$200/hr

G3 Unit Parameters

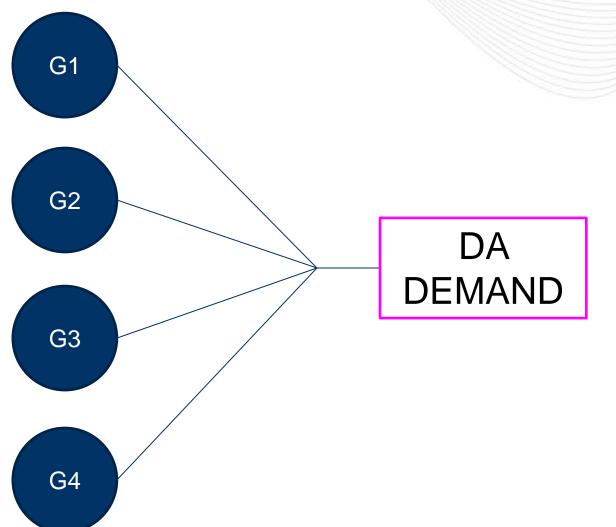
EcoMin = EcoMax = 100 MW Offer = \$70/MWh Startup Cost = \$300 No-Load = \$0/hr

G2 Unit Parameters EcoMax = 400 MW EcoMin = 200 MW Offer @ EcoMax = \$40/MWh Offer @ EcoMin = \$20/MWh Startup Cost = \$0 No-Load = \$200/hr

G4 Unit Parameters

EcoMin = EcoMax = 100 MW Offer = \$75/MWh Startup Cost = \$300 No-Load = \$0/hr





- At 550 MW of load
 - G1 = 150 MW
 - G2 = 400 MW
 - G3 = 0 MW
 - G4 = 0 MW
- G1 is marginal
 - LMP = \$45.10/MWh

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Example 2: Real-time

G1 trips in real-time

- Load is still 550 MW
 - G1 = 0 MW
 - G2 = 350 MW
 - G3 = 100 MW
 - G4 = 100 MW
- G2 is marginal
 - LMP = \$35.10/MWh

G2

G3

G4

RT LOAD



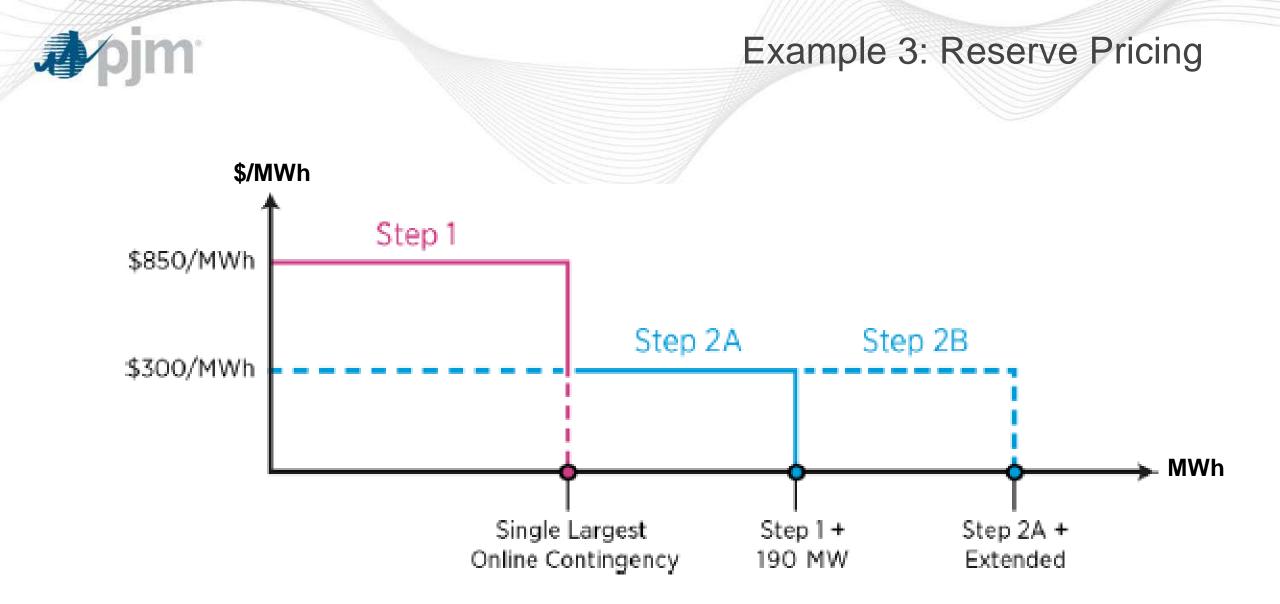
- G1 has tripped
- The real-time LMP is set by G2 as it is the only dispatchable unit on the system
 - LMP is set consistent with the cost of the next MW at \$35.10/MWh
- G1 must purchase out of its DA commitment at the RT LMP
 - This nets a margin of \$10/MWh
- The uplift costs to G3 and G4 (~\$8,080) are allocated to deviations between DA and RT
 - Assuming G3 and G4 are not for conservative operations



Example 2: Shortcomings of Prices

- Real-time prices do not reflect the need or commitment of G3 and G4
- G1 is not held accountable for this deviation...it actually profits!
 G1 will receive a pro-rata share of the deviation charges.*
- This significantly diminishes performance incentives.

*Due to the simplicity of this example, G1 is the only resource deviating. In reality there are many that will all pay a share of uplift created by G1 in this case.



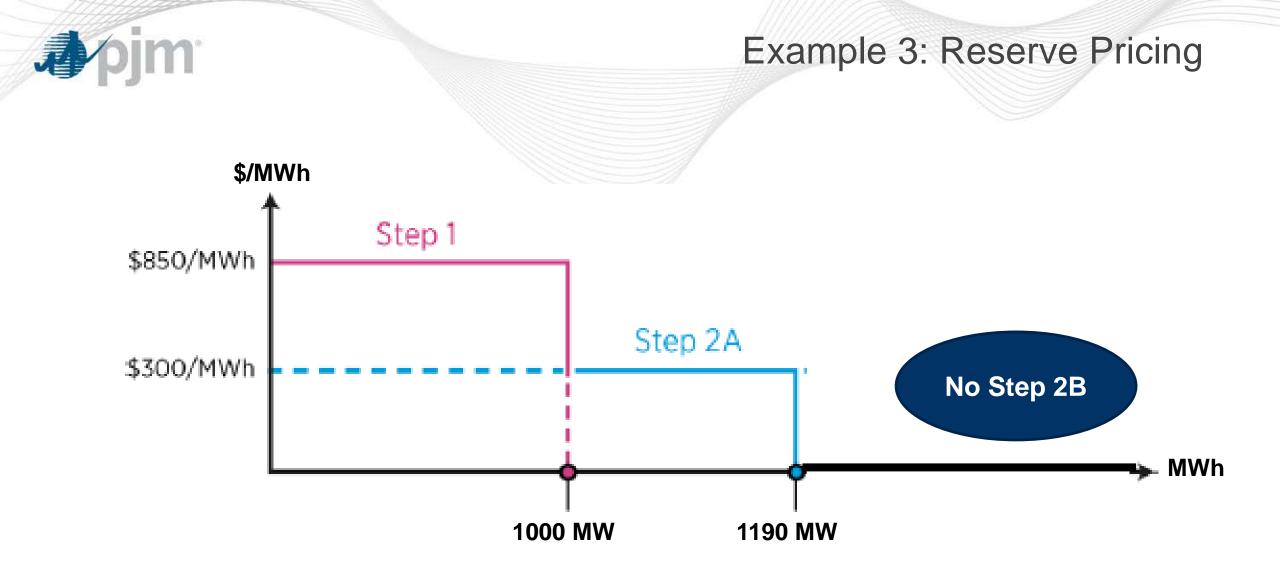
Example 3: Reserve Pricing

- Step 1 \$850/MWh
 - Largest single system contingency
 - Usually the largest unit
- Step 2A \$300/MWh
 - Additional reserves added July 2017
 - Intended to mitigate significant pricing impacts from transient shortages
- Step 2B (optional) \$300/MWh
 - Intended to reflect additional reserves added by operators



Example 3: Background and Interpretation

- Step 1
 - Load is not willing to pay more that \$850/MWh to maintain the system's largest single contingency in reserves
 - PJM system operators will commit reserves beyond this cost to maintain reliability and compliance
 - In these cases, the market prices are not reflecting operator actions
- \$850/MWh was determined in 2007 based on the average cost of reserves during shortage events during that time
 - Offer cap was \$1,000/MWh at that time
- There are similar interpretations for Steps 2A and 2B





- PJM estimates the amount of Tier 1 on the system every 5 minutes
- If PJM estimates more than 1190 MW in Tier 1 (even by 1 MW) the price for Synchronized Reserves is \$0/MWh
- This indicates reserves have no value. This is inconsistent with the reliability value in terms reducing the loss of load probability in real-time
- If PJM cannot meet the requirement at the specified price, even if its by 1 MW, the price goes to the applicable penalty factor



- Similar to energy, there are resources in the PJM market that have lumpy reserve capabilities
 - Synchronous condensing resource with a non-zero economic min
 - Fast-start CT with a non-zero economic min
- For the same reason these resources cannot set prices in the energy market, they cannot set price in the reserve markets
- This results in these resources often requiring reserve LOC payments in addition to the market clearing price
- This accounts for about 65% of the total Synchronized Reserve market billing



Example 4: Inflexible Reserve Resources and Pricing

- Reserve Market Clearing:
 - 1 hour ahead commitment of inflexible reserve resources
 - Synchronous condensers
 - Demand response
 - 5 minute co-optimzation of remaining amount of reserves needed
 - Tier 1 estimation
 - Tier 2 assignments on flexible resources
 - Clearing price calculation



Example 4: Generator Offer Data

G1 Unit Parameters EcoMax = 300 MW EcoMin = 100 MW Offer @ EcoMax = \$60/MWh Offer @ EcoMin = \$40/MWh Reserve Offer = \$5/MWh Reserve Capability = 20 MW (flexible)

G3 Unit Parameters EcoMin = EcoMax = 40 MW Offer = \$70/MWh Reserve Offer = \$4/MWh Reserve Capability = 40 MW (inflexible) G2 Unit Parameters EcoMax = 400 MW EcoMin = 200 MW Offer @ EcoMax = \$40/MWh Offer @ EcoMin = \$20/MWh Reserve Offer = \$6/MWh Reserve Capability = 50 MW (flexible)

G4 Unit Parameters EcoMin = EcoMax = 30 MW Offer = \$75/MWh Reserve Offer = \$5MWh Reserve Capability = 30 MW (inflexible)

RESERVE REQUIREMENT = 75 MW



Example 4: Inflexible Reserve Resources and Pricing

- LOAD = 600 MW
 - LMP = \$50/MWh
 - Reserve Allocations (done based on offer + LOC)
 - G1: 20 MW Tier 1 estimate (\$0/MWh assessed offer because it is Tier 1)
 - G2: 0 MW (fully loaded for energy)
 - G3: 40 MW Tier 2 assignment (\$4/MWh offer)
 - G4: 30 MW Tier 2 assignment (\$5/MWh offer)
 - Total Reserves = 90 MW
 - 20 MW Tier 1
 - 70 MW Tier 2
- Today's rules produce an SRMCP = \$0/MWh despite needing G3 & G4 to avoid a reserve shortage (prices don't reflect operator actions)
- This price is not transparent
 - Out-of-market LOC payments to G3 & G4 needed due to \$0/MWh clearing price
 - Increase in energy dispatch of G1 and further tightening of reserve capability would result in \$0/MWh SRMCP until the point of shortage