CPQR Simulation Approach

RASTF June 10, 2022 Joe Bowring Siva Josyula



Competitive Offer

Unit specific competitive offer for a CP resource:
p = Net ACR + Net (Expected Penalties - Expected Bonuses)

$$or, p = \begin{cases} Net \ ACR + CPBR \ \times H \times (\overline{B} - \overline{A}), & if \ \overline{B} < \overline{A} \\ Net \ ACR + PPR \ \times H \times (\overline{B} - \overline{A}), & if \ \overline{A} < \overline{B} \end{cases}$$

- Where:
 - Net ACR = Gross ACR Net E&AS revenues
 - CPBR is the average bonus payment rate during PAI
 - PPR is the average nonperformance charge rate during PAI (tariff defined).

- H is the expected number of PAI divided by 12
- \overline{A} is the expected unit performance during PAI
- \overline{B} is the expected balancing ratio during PAI



CPQR

- CPQR includes both the expected net nonperformance charges and the cost to mitigate the risk associated with the estimated net nonperformance charges.
- Net nonperformance charges can be simulated to account for uncertainty in the inputs to calculation (A, B, H).
- The MMU framework for evaluating the simulation approach was presented on March 24, 2022.





CPQR

CPQR = E(net penalties) + Cost of mitigating risk Where:

• *E(net penalties):* expected value (mean) from distribution of simulated outcome

Can be positive, negative, or zero.

- Cost of mitigating risk=Risk Cost x (Extreme Value Mean)
- Extreme Value: for example 30th percentile or 95th percentile of distribution of simulated outcomes.
- Risk Cost:
 - Cost of incurring risk of nonperformance penalties
 - $_{\circ}\,$ Affected by factors including portfolio



Simulation Model

- Simulation of CP nonperformance charges and bonus payments.
- The key inputs are:
 - A: Unit specific performance during PAH
 - B: Balancing Ratio during PAH
 - H: Number of PAH
 - CPBR: Average bonus payment rate during PAI
 - PPR: Nonperformance charge rate during PAI for the unit's zone (PPR value in tariff)
 - Stop loss limit
 - Tax rate
 - Historical temperature data.



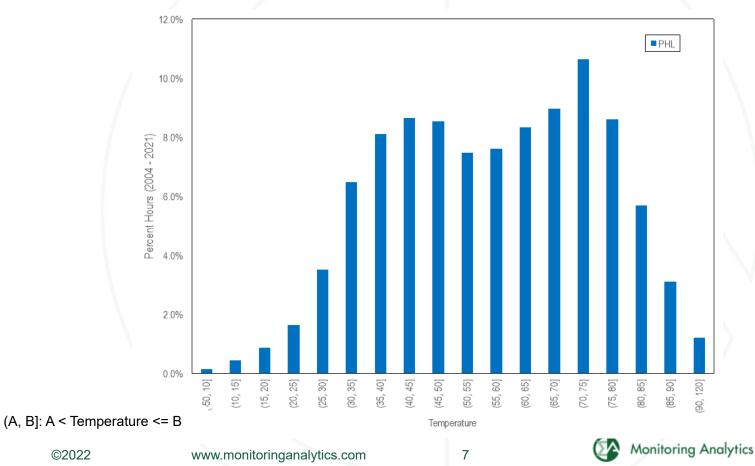


Simulation Model – Stage 1

- Two stage simulation.
- First stage simulates future temperature outcomes based on history.
 - Location is a proxy weather station close to the unit. For this example, location is PHL.
 - Assumes temperature is a multinomial random variable with probability calculated empirically.
- 500 sample years generated using 18 years (2004 2021) of weather history.
 - Each sample distributes 8,760 hours into the specified temperature ranges.

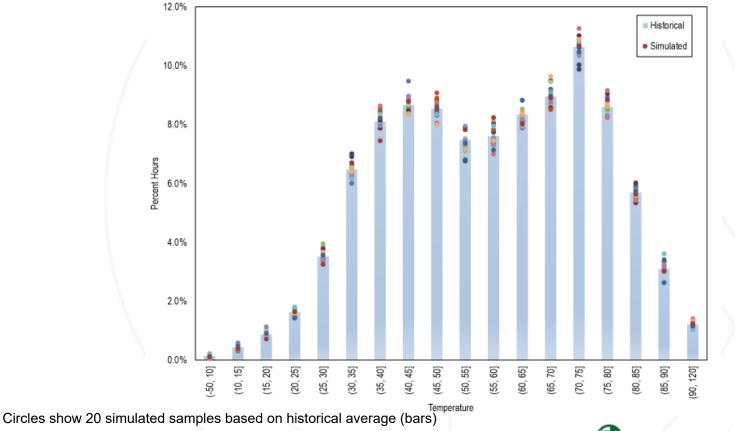


Example: PHL Temperature History



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Sample Simulated Temperature Distributions



Sample Simulated Temperature Distributions

 Table shows number of hours out of 8,760 that fall into each temperature category from three sample simulated years.

Ti	N(T _i)		
	Sample Year 1	Sample Year 2	Sample Year 3
(-50, 10]	9	8	11
(10, 15]	36	45	47
(15, 20]	79	87	66
(20, 25]	155	128	155
(25, 30]	335	304	346
(30, 35]	552	572	580
(35, 40]	721	714	718
(40, 45]	761	765	749
(45, 50]	759	795	701
(50, 55]	629	638	640
(55, 60]	640	651	659
(60, 65]	734	691	747
(65, 70]	758	762	802
(70, 75]	933	938	933
(75, 80]	783	773	745
(80, 85]	500	481	490
(85, 90]	280	299	268
(90, 120]	96	109	103
Total	8,760	8,760	8,760
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Simulation Model – Stage 2

- Second stage simulates:
 - conditional probability of PAH given temperature,
 - conditional probability of forced outage given temperature,

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• balancing ratio during PAH given temperature.

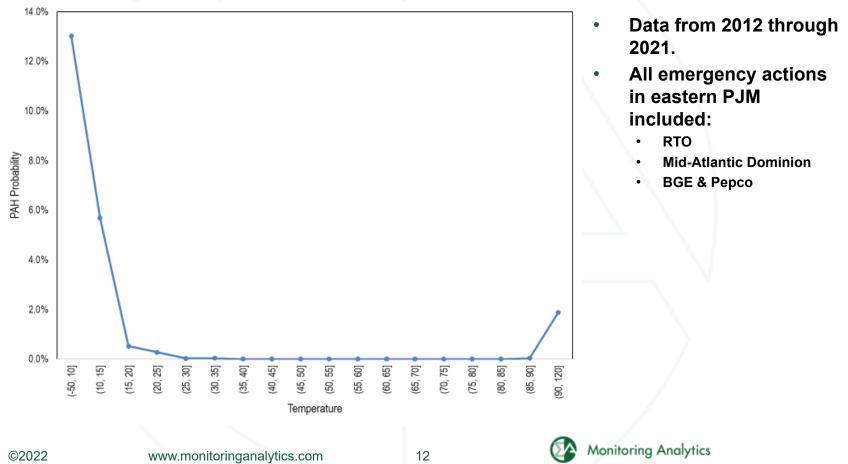
Simulation Model – Stage 2

- Conditional probability of PAH given a temperature range is based on 10 year history of temperature and PAH or proxy.
 - PAH includes emergency actions that would have triggered PAH prior to Capacity Performance.
 - Temperature dependent PAH probabilities calculated for the zone where unit is located.

- Fewer emergencies since CP implemented.
- Ten year history overestimates emergencies.



PAH Conditional Probabilities

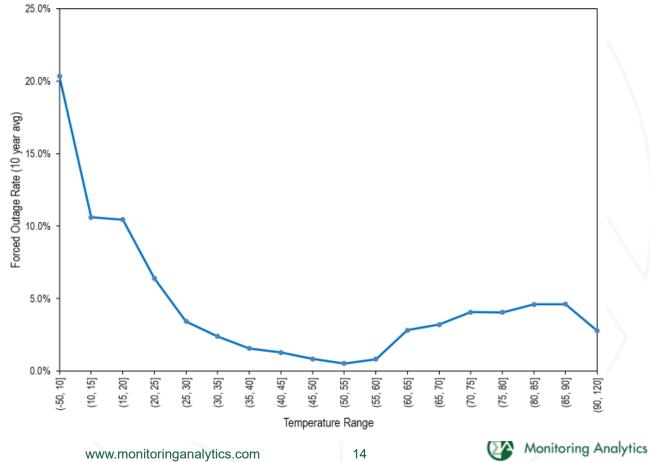


Simulation Model – Stage 2

- Conditional probability of unit forced outages given a temperature range is based on 10 year history of temperature and forced outages
 - Unit specific calculation based on GADS reported forced outages.
 - Equivalent forced outage rate calculated that includes both derates and full unit forced outages.
- Outage rates lower since CP implemented.
- Ten year history overestimates forced outage rates.



Example Unit Forced Outage Probabilities

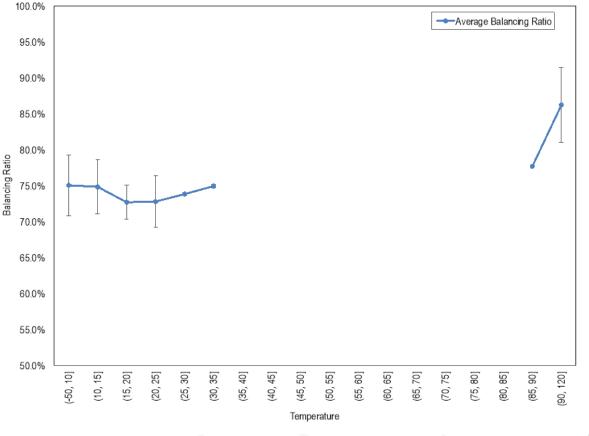


Balancing Ratio (B)

- Conditional value of balancing ratio during a PAH, given a temperature range, is based on 10 year history of balancing ratios during PAH or proxy PAH.
- Balancing ratio is used to calculate expected performance for each resource during a PAI.
- B calculated for the RTO even if the emergency was regional. Same PAH as used in the PAH history.
 - RTO
 - Mid-Atlantic & Dominion
 - BGE & Pepco



Balancing Ratio



Balancing ratio exists only for categories with historical PAH or proxy PAH.

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- Error bars show the standard deviation of balancing ratio for each temperature category.
- No error bars indicate very few PAH (1 or 2).

Simulating penalties and bonuses – Stage 2

- For each temperature range, conditional probabilities of PAH and unit forced outages are simulated as results of a binomial process (repeated Bernoulli trials).
- 1,000 Bernoulli trials:
 - PAH = 1 or 0, and FO = 1 or 0.
 - If PAH = 1 and FO = 1, then penalty.
 - If PAH = 1 and FO = 0 then bonus.
 - If PAH = 0, no penalty or bonus regardless of FO.
- For each temperature range, B is simulated as a normal random variable with the historical mean and standard deviation.



Simulating penalties and bonuses – Stage 2

- Each binomial process generates conditional probabilities for a given temperature range, *i*:
 - Probability of PAH, $p(PAH/T) = \sum (PAH)/1,000$
 - Probability of penalties, $p(\frac{penalties}{T}) = \sum (PAH * FO)/1,000$
 - Probability of bonuses, $p(bonuses, p(-FO)) = \sum (PAH * (1 FO))/1,000$
- For each penalty or bonus hour, a unit would pay maximum nonperformance charges for MW = B*UCAP.
- Similarly, a unit is eligible for bonuses for MW = (1 B)*UCAP.
- Incorporating the simulated B:
 - Penalty probability $P({}^{pen}/T_i) = \sum (PAH * FO * B_i)/1,000$
 - Bonus probability $P(\frac{bon}{T_i}) = \sum (PAH * (1 FO) * (1 B_i))/1,000$



Net Penalty Probability – Stage 2

- 1,000 such conditional probabilities are generated for each temperature category.
- The net penalty probability for temperature category *i* is calculated as:

$$p\left(\frac{net}{T_{i}}\right) = P\left(\frac{pen}{T_{i}}\right) - P\left(\frac{bon}{T_{i}}\right)$$

- Portion of underperformance can be excused.
 - Results in effective penalty rate lower than the tariff defined rate.
 - Results in bonus payment rate lower than penalty rate.





Combining Stage 1 and Stage 2

- Each of the 1,000 stage 2 simulated outcomes is multiplied by the number of hours in that temperature category N(T_i), for each of the 500 simulated years to get the net penalty hours.
- (Net Penalty Hours)_i = $N(T_i) * P(\frac{net}{T_i})$
- Total net penalty hours = $\sum_{i} (Net penalty hours)_{i}$
- Results in 500,000 possible outcomes for each unit for net non performance charges in a year.
 - Mean is the expected net penalty hours in a year.
 - Percentiles show the distribution of net penalty hours in a year.



Sample Results: Net nonperformance charges

Net Nonperformance Charges (\$/MW-day) UCAP -\$7.7 Mean (m) Percentiles -\$11.2 p5 -\$10.4 p10 -\$9.1 p25 p50 -\$7.7 -\$6.3 p75 -\$5.2 p90 p95 -\$4.4 \$3.3 p95 - Mean (a) Cost of Risk (b) 10% Risk Premium (c=a*b) \$0.33 Mean + Risk Premium (m+c) -\$7.39

- Using nonperformance charge rate = \$3,366.27 per MWh (EMAAC, 2023/2024 BRA)
- Net nonperformance charges (\$/MWday) = Net penalty hours*Rate (\$/MWh)/365.



Notes

- The simulation outcome is the \$/MW-day UCAP value.
 - Auction EFORd needed to convert to \$/MW-day ICAP terms.
- No GADS data for intermittent resources.
 - The source of risk is due to both intermittency and forced outages.
 - ELCC reduces committed UCAP, reduces risk of penalties.
- Newer units without long history need proxy outage rates if they have not operated under extreme temperatures.
 - Nonperformance risk is concentrated in extreme temperature ranges.



Monitoring Analytics, LLC 2621 Van Buren Avenue Suite 160 Eagleville, PA 19403 (610) 271-8050

MA@monitoringanalytics.com www.MonitoringAnalytics.com

