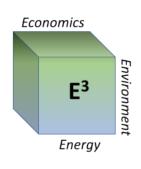


Update on Default MSOC Proposal: Back Cast with Historic Prices and Net CONE

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June 10, 2022

RASTF



Overview and Context

- This presentation is in response to requests for a back cast on the MSOC proposed by E-Cubed that is the variant on Net CONE*B.
- Question is to look at historic PAH/PAI, Net CONE, and Prices to see if the marginal offer may have been reviewed.
 - Note, E-Cubed does not endorse the idea that marginal offers must be reviewed.
 - But for some exceptions, the IMM has noted RPM BRA outcomes have been competitive but for a few bad actors
- Conclusion: Back cast shows that the proposed method would, in most LDAs, results in the marginal offers having been reviewed.
 - Exceptions are in BGE, Pepco, and ATSI

Proposed Default MSOC

$$P \ge Net\ CONE \times \frac{H_{expected}}{H_{penalty}} \times \bar{B}$$

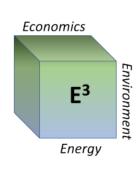
• With an RTO Net CONE of \$274.95/MW-day for the 20, and the known historic hours at 4.2 in RTO since 2011/2012, and 30 used for the penalty, and a balancing ratio of 0.85, the new MSOC would be \$/MW-day in RTO.

•
$$$32.72 \ge 274.95 \times \frac{4.2}{30} \times \overline{0.85}$$

• For Mid-Atlantic, there are 6.3 PAH on average since 2011/2012, and using the MAAC Net CONE of \$275/.08/MW-day the new MSOC would be

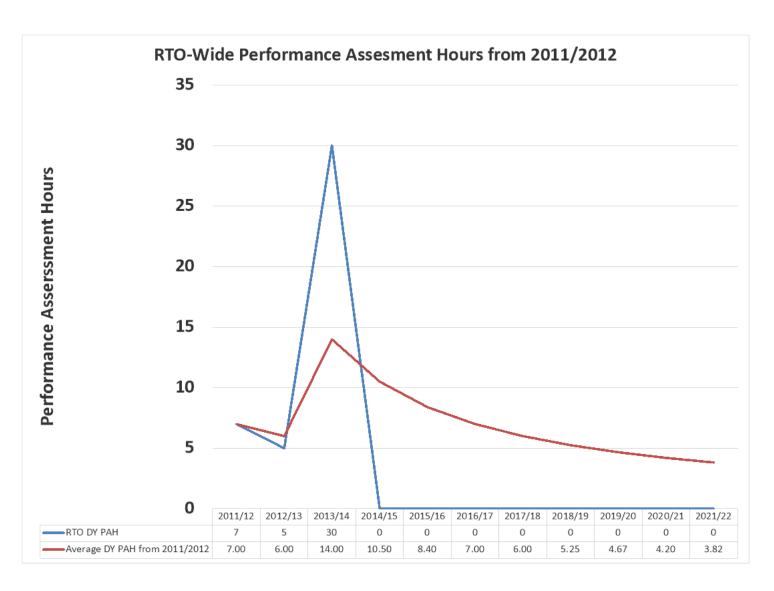
•
$$$49.10 \ge 275.08 \times \frac{6.3}{30} \times \overline{0.85}$$

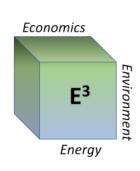
 Based on the idea of being indifferent between taking on a capacity commitment and being energy only given the resources stays in service regardless of clearing the BRA.



RTO-Wide PAH

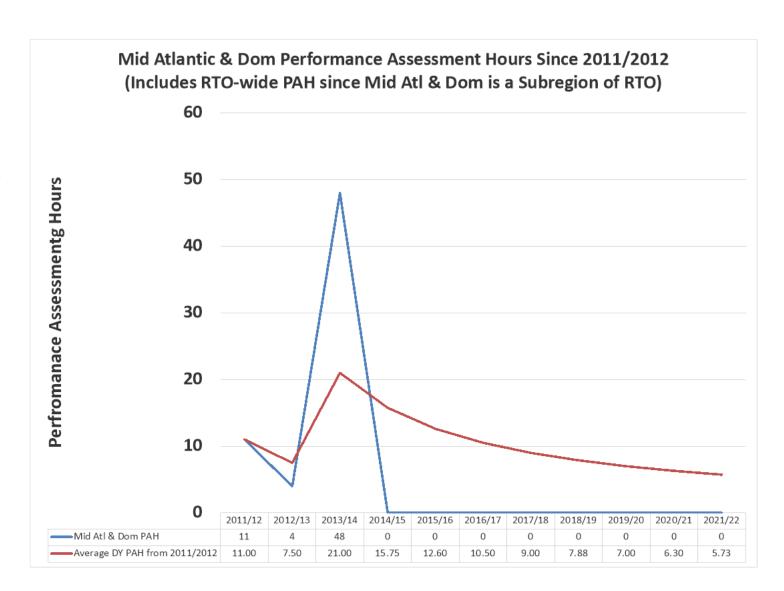
- There have been no PAH in the RTO-wide area since 2013/2014 DY.
- Through today, only 3.82 PAH on average since 2011/2012
- PAH in sub regions of RTO are additive to the RTO value.

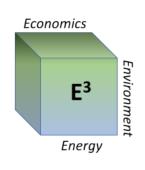




Mid-Atlantic & Dominion

- More hours in this subregion as it includes RTO-wide and PAH for Mid Atl-Dom only.
- Since 2011/2012, the current PAH is 5.73 PAH to date.
- Mid-Atl-Dom wide since 2013/2014

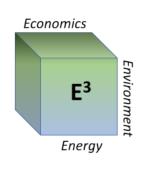




Zonal Alone PAH events on Average Since 2011/2012

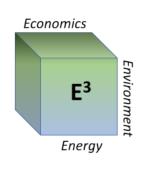
| | В | GE | | Pepco | | Dom | | Comed | | AEP | | ATSI | ļ | AE | | DLCO | |
|--------|-----------|----|-------|-------|------|-----|------|-------|------|-----|------|------|------|----|------|------|------|
| 2011/3 | 12 | 11 | 11.00 | 0 | 0.00 | 0 | 0.00 | 1 | 1.00 | 0 | 0.00 | 0 | 0.00 | 9 | 9.00 | 4 | 4.00 |
| 2012/ | 13 | 0 | 5.50 | 0 | 0.00 | 0 | 0.00 | 0 | 0.50 | 0 | 0.00 | 0 | 0.00 | 0 | 4.50 | 0 | 2.00 |
| 2013/ | 14 | 10 | 7.00 | 10 | 3.33 | | 0.00 | 6 | 2.33 | 21 | 7.00 | 21 | 7.00 | 0 | 3.00 | 0 | 1.33 |
| 2014/ | 15 | 0 | 5.25 | 0 | 2.50 | 0 | 0.00 | 2 | 2.25 | 0 | 5.25 | 0 | 5.25 | 0 | 2.25 | 0 | 1.00 |
| 2015/ | 16 | 0 | 4.20 | 0 | 2.00 | 0 | 0.00 | 0 | 1.80 | 0 | 4.20 | 0 | 4.20 | 0 | 1.80 | 0 | 0.80 |
| 2016/ | 17 | 0 | 3.50 | 0 | 1.67 | 0 | 0.00 | 0 | 1.50 | 0 | 3.50 | 0 | 3.50 | 0 | 1.50 | 0 | 0.67 |
| 2017/ | 18 | 0 | 3.00 | 0 | 1.43 | 0 | 0.00 | 0 | 1.29 | 0 | 3.00 | 0 | 3.00 | 0 | 1.29 | 0 | 0.57 |
| 2018/ | 19 | 0 | 2.63 | 0 | 1.25 | 0 | 0.00 | 0 | 1.13 | 0 | 2.63 | 0 | 2.63 | 0 | 1.13 | 0 | 0.50 |
| 2019/2 | 20 | 6 | 3.00 | 6 | 1.78 | 6 | 0.75 | 0 | 1.00 | 6 | 3.00 | 0 | 2.33 | 0 | 1.00 | 0 | 0.44 |
| 2020/2 | 21 | 0 | 2.70 | 0 | 1.60 | 0 | 0.67 | 0 | 0.90 | 0 | 2.70 | 0 | 2.10 | 0 | 0.90 | 0 | 0.40 |
| 2021/2 | 22 | 0 | 2.45 | 0 | 1.45 | 0 | 0.60 | 0 | 0.82 | 0 | 2.45 | 0 | 1.91 | 0 | 0.82 | 0 | 0.36 |

https://www.pjm.com/-/media/committees-groups/committees/elc/postings/performance-assessment-hours-2011-2014-xls.ashx and https://emergencyprocedures.pjm.com/ep/pages/dashboard.jsf



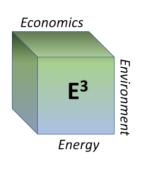
Historic CP Clearing Prices by LDA

| BRA Year | RTO | MAAC | EMAAC | SWMAAC | PS | PS NORTH | DPL SOUTH | PEPCO | ATSI | ATSI- CLEVELA ND | COMED | BGE | PL | DAYTON | DEOK |
|----------|----------|----------|----------|----------|----------|-------------|--------------|----------|----------|------------------------|----------|----------|----------|----------|----------|
| 16/17 | \$134.00 | \$134.00 | \$134.00 | \$134.00 | \$134.00 | \$134.00 | \$134.00 | \$134.00 | \$134.00 | \$134.00 | ** | ** | ** | ** | ** |
| 17/18 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | \$151.50 | ** | ** |
| 18/19 | \$164.77 | \$164.77 | \$225.42 | \$164.77 | \$225.42 | \$225.42 | \$225.42 | \$164.77 | \$164.77 | \$164.77 | \$215.00 | \$164.77 | \$164.77 | ** | ** |
| 19/20 | \$100.00 | \$100.00 | \$119.77 | \$100.00 | \$119.77 | \$119.77 | \$119.77 | \$100.00 | \$100.00 | \$100.00 | \$202.77 | \$100.30 | \$100.00 | ** | ** |
| 20/21 | \$76.53 | \$86.04 | \$187.87 | \$86.04 | \$187.87 | \$187.87 | \$187.87 | \$86.04 | \$76.53 | \$76.53 | \$188.12 | \$86.04 | \$86.04 | \$76.53 | \$130.00 |
| 21/22 | \$140.00 | \$140.00 | \$165.73 | \$140.00 | \$204.29 | \$204.29 | \$165.73 | \$140.00 | \$171.33 | \$171.33 | \$195.55 | \$200.30 | \$140.00 | \$140.00 | \$140.00 |
| 22/23 | \$50.00 | \$95.79 | \$97.86 | \$95.79 | \$97.86 | \$97.86 | \$97.86 | \$95.79 | \$50.00 | \$50.00 | \$68.96 | \$126.50 | \$95.79 | \$50.00 | \$71.69 |



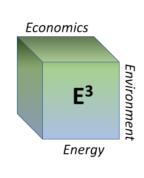
Historic Net CONE by LDA

| | | | | | | | | | | ATSI- | | | | | |
|----------|----------|----------|----------|----------|----------|-------------|--------------|----------|----------|---------------|----------|----------|----------|----------|----------|
| BRA Year | RTO | MAAC | EMAAC | SWMAAC | PS | PS NORTH | DPL SOUTH | PEPCO | ATSI | CLEVELA ND | COMED | BGE | PL | DAYTON | DEOK |
| 16/17 | \$330.53 | \$276.90 | \$329.94 | \$276.90 | \$329.94 | \$329.94 | \$329.94 | \$276.90 | | \$362.64 | | | | | |
| 17/18 | \$351.39 | \$313.00 | \$365.87 | \$313.00 | \$365.87 | \$365.87 | \$365.87 | \$313.00 | \$373.75 | \$373.75 | \$373.75 | \$313.00 | \$354.46 | | |
| 18/19 | \$300.57 | \$271.67 | \$284.82 | \$243.17 | \$297.99 | \$297.99 | \$258.32 | \$250.74 | \$271.72 | \$271.72 | \$320.29 | \$235.59 | \$284.79 | | |
| 19/20 | \$299.30 | \$262.02 | \$283.63 | \$229.93 | \$303.30 | \$303.30 | \$262.27 | \$244.23 | \$264.06 | \$264.06 | \$328.44 | \$215.62 | \$277.74 | | |
| 20/21 | \$292.95 | \$252.40 | \$283.10 | \$202.43 | \$306.92 | \$306.92 | \$254.97 | \$226.53 | \$261.17 | \$261.17 | \$329.81 | \$178.33 | \$267.33 | \$273.14 | \$282.46 |
| 21/22 | \$321.57 | \$292.69 | \$313.77 | \$264.88 | \$330.61 | \$330.61 | \$300.18 | \$285.42 | \$306.87 | \$306.87 | \$344.36 | \$244.33 | \$300.72 | \$312.56 | \$312.80 |
| 22/23 | \$260.50 | \$245.12 | \$259.36 | \$242.95 | \$268.44 | \$268.44 | \$236.18 | \$259.52 | \$230.50 | \$230.50 | \$247.86 | \$226.37 | \$250.41 | \$226.32 | \$223.63 |
| 23/24 | \$274.96 | \$275.08 | \$291.36 | \$244.72 | \$299.61 | \$299.61 | \$264.91 | \$270.00 | \$263.07 | \$263.07 | \$284.97 | \$219.44 | \$279.52 | \$246.93 | \$252.63 |



MSOC Calculation: Zone/LDA Specific

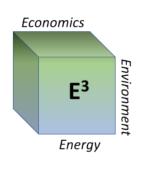
- For each modeled LDA and Zone, the MSOC is specific based on:
 - Net CONE
 - Historic rolling average of PAH.
- Some zones within LDAs have had events that would be considered PAH and these zonal differences should be reflected.
- These can be easily plugged into the MSOC formula.
- For each BRA, use the rolling average from the most recent completed Delivery Year at the start of auction timeline for MSOC



Zonal Alone PAH events on Average Since 2011/2012

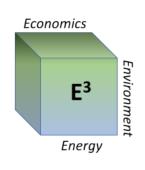
| Zone | Average PAH since 2011/2012 |
|----------|-----------------------------|
| BGE | 2.45 |
| Pepco | 1.45 |
| Dominion | 0.6 |
| ComEd | 0.82 |
| AEP | 2.45 |
| ATSI | 1.91 |
| AE | 0.82 |
| DLCO | 0.36 |

- These hours would be additive to the PAH or the wider parent LDA/zone in which the transmission zone resides.
- For example, AEP and ATSI would be added to RTO-wide, increasing the "risk" of PAH
 - AEP 2.45 + RTO 3.82 = 6.27 PAH
 - ATSI 1.91 + RTO 3.82 = 5.73 PAH
- However, BGE and Pepco are in Mid-Atl
 - BGE 2.45 + MidAtl 5.73 = 8.28 PAH



MSOC for Mid-Atlantic Zones: Rolling Average Used

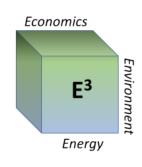
| | Avg. PAH Hours |
|---|-------------------|
| 16/17 BRA in 2013 use thru 11/12 | 11 |
| 17/18 BRA in 2014 use thru 12/13 | 7.5 |
| 18/19 BRA in 2015 use thru 13/14 | 21 |
| 19/20 BRA in 2016 use thru 14/15 | 15.75 |
| 20/21 BRA in 2017 use thru 15/16 | 12.6 |
| 21/22 BRA in 2018 use thru 16/17 | 10.5 |
| 22/23 BRA in 2021 use thru 19/20 due to delay | 7 |
| 23/24 BRA in 2022 use thru 20/21 due to delay | 6.3 |



Back Cast MSOC for Mid-Atlantic Zones

| | Avg. PAH | | | | | PS | DPL | | | |
|--------------------------------------|----------|----------|--------------|---------------|----------|----------|----------|----------|----------|----------|
| | Hours | MAAC | EMAAC | SWMAAC | PS | NORTH | SOUTH | PEPCO | BGE | PL |
| 16/17 BRA in 2013 use thru 11/12 | 11 | \$86.30 | \$102.83 | \$86.30 | \$102.83 | \$102.83 | \$102.83 | \$86.30 | \$172.60 | \$0.00 |
| 17/18 BRA in 2014 use thru 12/13 | 7.5 | \$66.51 | \$77.75 | \$66.51 | \$77.75 | \$77.75 | \$77.75 | \$66.51 | \$115.29 | \$75.32 |
| 18/19 BRA in 2015 use thru 13/14 | 21 | \$161.64 | \$169.47 | \$144.69 | \$177.30 | \$177.30 | \$153.70 | \$172.87 | \$186.90 | \$169.45 |
| 19/20 BRA in 2016 use thru 14/15 | 15.75 | \$116.93 | \$126.57 | \$102.61 | \$135.35 | \$135.35 | \$117.04 | \$126.29 | \$128.29 | \$123.94 |
| 20/21 BRA in 2017 use thru 15/16 | 12.6 | \$90.11 | \$101.07 | \$72.27 | \$109.57 | \$109.57 | \$91.02 | \$93.71 | \$84.89 | \$95.44 |
| 21/22 BRA in 2018 use thru 16/17 | 10.5 | \$87.08 | \$93.35 | \$78.80 | \$98.36 | \$98.36 | \$89.30 | \$98.39 | \$96.92 | \$89.46 |
| 22/23 BRA in 2021 use thru 19/20 due | | | | | | | | | | |
| to delay | 7 | \$48.62 | \$51.44 | \$48.19 | \$53.24 | \$53.24 | \$46.84 | \$64.54 | \$64.14 | \$49.66 |
| 23/24 BRA in 2022 use thru 20/21 due | | | | | | | | | | |
| to delay | 6.3 | \$49.10 | \$52.01 | \$43.68 | \$53.48 | \$53.48 | \$47.29 | \$60.44 | \$55.96 | \$49.89 |

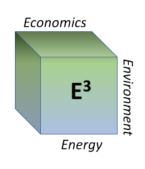
Some Zones such as Pepco and BGE use different PAH values since they had zonal specific events



BRA Price minus MSOC Back Cast for Mid-Atlantic Zones

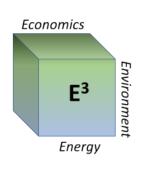
| | | | | | | | | | | ا | DPL | | | |
|--------------------------------------|----|---------|-----|--------|-----|--------|---------------|----|---------|----|-------|----------|----------|----------|
| | Λ | ЛААС | EIV | IAAC | SWI | MAAC | PS | PS | NORTH | SC | DUTH | PEPCO | BGE | PL |
| 16/17 BRA in 2013 use thru 11/12 | \$ | 47.70 | \$ | 31.17 | \$ | 47.70 | \$ 31.17 | \$ | 31.17 | \$ | 31.17 | \$47.70 | -\$38.60 | \$0.00 |
| 17/18 BRA in 2014 use thru 12/13 | \$ | 84.99 | \$ | 73.75 | \$ | 84.99 | \$ 73.75 | \$ | 73.75 | \$ | 73.75 | \$84.99 | \$36.21 | \$75.32 |
| 18/19 BRA in 2015 use thru 13/14 | \$ | 3.13 | \$ | 55.95 | \$ | 20.08 | \$ 48.12 | \$ | 48.12 | \$ | 71.72 | -\$8.10 | -\$22.13 | \$169.45 |
| 19/20 BRA in 2016 use thru 14/15 | \$ | (16.93) | \$ | (6.80) | \$ | (2.61) | \$ (15.58) | \$ | (15.58) | \$ | 2.73 | -\$26.29 | -\$27.99 | \$123.94 |
| 20/21 BRA in 2017 use thru 15/16 | \$ | (4.07) | \$ | 86.80 | \$ | 13.77 | \$ 78.30 | \$ | 78.30 | \$ | 96.85 | -\$7.67 | \$1.15 | \$95.44 |
| 21/22 BRA in 2018 use thru 16/17 | \$ | 52.92 | \$ | 72.38 | \$ | 61.20 | \$ 105.93 | \$ | 105.93 | \$ | 76.43 | \$41.61 | \$103.38 | \$89.46 |
| 22/23 BRA in 2021 use thru 19/20 due | | | | | | | | | | | | | | |
| to delay | \$ | 47.17 | \$ | 46.42 | \$ | 47.60 | \$ 44.62 | \$ | 44.62 | \$ | 51.02 | \$31.25 | \$62.36 | \$49.66 |
| 23/24 BRA in 2022 use thru 20/21 due | | | | | | | | | | | | | | |
| to delay | | | | | | | | | | | | | | |

A positive difference implies the BRA Clearing Price was greater than the MSOC in the back cast



MSOC for RTO: Rolling Average Used

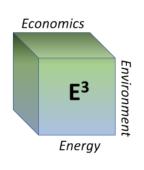
| | Avg. PAH Hours |
|---|-------------------|
| 16/17 BRA in 2013 use thru 11/12 | 7 |
| 17/18 BRA in 2014 use thru 12/13 | 6 |
| 18/19 BRA in 2015 use thru 13/14 | 14 |
| 19/20 BRA in 2016 use thru 14/15 | 10.5 |
| 20/21 BRA in 2017 use thru 15/16 | 8.4 |
| 21/22 BRA in 2018 use thru 16/17 | 7 |
| 22/23 BRA in 2021 use thru 19/20 due to delay | 4.67 |
| 23/24 BRA in 2022 use thru 20/21 due to delay | 4.2 |



Back Cast MSOC for RTO

| | Avg. PAH | | | ATSI- | | | |
|---|----------|----------|----------|-----------|----------|---------|---------|
| | Hours | RTO | ATSI | CLEVELAND | COMED | DAYTON | DEOK |
| 16/17 BRA in 2013 use thru 11/12 | 7 | \$65.56 | \$113.02 | \$113.02 | \$112.38 | | |
| 17/18 BRA in 2014 use thru 12/13 | 6 | \$59.74 | \$79.42 | \$79.42 | \$84.72 | | |
| 18/19 BRA in 2015 use thru 13/14 | 14 | \$119.23 | \$215.56 | \$215.56 | \$211.75 | | |
| 19/20 BRA in 2016 use thru 14/15 | 10.5 | \$89.04 | \$157.12 | \$157.12 | \$167.50 | | |
| 20/21 BRA in 2017 use thru 15/16 | 8.4 | \$69.72 | \$124.32 | \$124.32 | \$134.56 | \$65.01 | \$67.23 |
| 21/22 BRA in 2018 use thru 16/17 | 7 | \$63.78 | \$121.73 | \$121.73 | \$117.08 | \$61.99 | \$62.04 |
| 22/23 BRA in 2021 use thru 19/20 due to delay | 4.67 | \$34.44 | \$60.95 | \$60.95 | \$56.18 | \$29.92 | \$29.57 |
| 23/24 BRA in 2022 use thru 20/21 due to delay | 4.2 | \$32.72 | \$62.61 | \$62.61 | \$58.13 | \$29.38 | \$30.06 |

Some Zones such as AEP, ATSI, DOM, ComEd use different PAH values since they had zonal specific events



BRA Price minus MSOC Back Cast for RTO

| | | | ATOL | | | |
|---|---------|----------|-----------|---------|---------|---------|
| | | | ATSI- | | | |
| | RTO | ATSI | CLEVELAND | COMED | DAYTON | DEOK |
| 16/17 BRA in 2013 use thru 11/12 | \$68.44 | \$20.98 | \$20.98 | \$21.62 | | |
| 17/18 BRA in 2014 use thru 12/13 | \$91.76 | \$72.08 | \$72.08 | \$66.78 | | |
| 18/19 BRA in 2015 use thru 13/14 | \$45.54 | -\$50.79 | -\$50.79 | \$3.25 | | |
| 19/20 BRA in 2016 use thru 14/15 | \$10.96 | -\$57.12 | -\$57.12 | \$35.27 | | |
| 20/21 BRA in 2017 use thru 15/16 | \$6.81 | -\$47.79 | -\$47.79 | \$53.56 | \$11.52 | \$62.77 |
| 21/22 BRA in 2018 use thru 16/17 | \$76.22 | \$49.60 | \$49.60 | \$78.47 | \$78.01 | \$77.96 |
| 22/23 BRA in 2021 use thru 19/20 due to delay | \$15.56 | -\$10.95 | -\$10.95 | \$12.78 | \$20.08 | \$42.12 |
| 23/24 BRA in 2022 use thru 20/21 due to delay | | | | | | |

A positive difference implies the BRA Clearing Price was greater than the MSOC in the back cast