

Financial Transmission and Auction Revenue Rights

In an LMP market, the lowest cost generation is dispatched to meet the load, subject to the ability of the transmission system to deliver that energy. When the lowest cost generation is remote from load centers, the physical transmission system permits that lowest cost generation to be delivered to load. This was true prior to the introduction of LMP markets and continues to be true in LMP markets. Prior to the introduction of LMP markets, contracts based on the physical rights associated with the transmission system were the mechanism used to provide for the delivery of low cost generation to load. Firm transmission customers who paid for the transmission system through rates were the beneficiaries of the system.

After the introduction of LMP markets, financial transmission rights (FTRs) were introduced to permit the loads which pay for the transmission system to continue to receive those benefits in the form of revenues which offset congestion to the extent permitted by the transmission system.¹ Financial transmission rights and the associated revenues were directly provided to loads in recognition of the facts that loads pay for the transmission system which permits low cost generation to be delivered to load. Another way of describing the result is that FTRs and the associated congestion revenues were directly provided to loads in recognition of the fact that load pays locational prices which result in load payments in excess of generation revenues which are the source of the funds available to offset congestion costs in an LMP market.² Congestion is defined to be load payments in excess of generation revenues. Congestion revenues are the source of the funds to pay FTRs. In an LMP system, the only way to ensure that load receives the benefits associated with the use of the transmission system to deliver low cost energy is to use FTRs, or an equivalent mechanism, to pay back to load the difference between the total load payments and the total generation revenues. The only way to ensure that load receives the benefits associated with the use of the transmission system to deliver low cost energy is to ensure that all congestion revenues are returned to load. Congestion revenues are defined to be equal to the sum

of day ahead and balancing congestion. FTRs are one way to do that.

Effective June 1, 2003, PJM replaced the direct allocation of FTRs to load with an allocation of Auction Revenue Rights (ARRs). The load still owns the rights to congestion collected under this system, but the ARR construct allows load to either claim the FTRs directly (through a process called self scheduling), or to sell the rights in the FTR auction in exchange for a revenue stream based on the prices of the FTRs. Under the ARR construct, all of the FTR auction revenues should belong to the load and all of the congestion revenues should belong to those that purchase or self schedule the FTRs.

The current ARR/FTR design does not serve as an efficient way to ensure that load receives all the congestion revenues or has the ability to receive the auction revenues associated with all the potential congestion revenues. Total ARR and self scheduled FTR revenue offset only 63.8 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2014 to 2015 planning period. One of the reasons for this inefficiency is the link, established by PJM member companies in their initial FTR filings, between congestion revenues and specific generation to load transmission paths. The original filings, made before PJM members had any experience with LMP markets, retained the view of congestion rooted in physical transmission rights. In an effort to protect themselves, the PJM utilities linked the payment of FTRs to specific, physical contract paths from specific generating units to specific load zones. That linkage was inconsistent with the appropriate functioning of FTRs in an LMP system. The ARR allocation in 2015 continued to be based on those original physical generation to load paths, an illustration of the inadequacy of that approach and a source of the issues with the FTR model in 2015.

If the original PJM FTR design had simply been designed to return congestion revenues to load, many of the subsequent issues with the FTR design would have been avoided. Now is a good time to address the issues of the FTR design and to return the design to its original purpose. This would eliminate much of the complexity associated with ARRs and FTRs and eliminate unnecessary controversy about the appropriate recipients of congestion revenues.

¹ See 81 FERC ¶ 61,257, at 62,241 (1997).

² See *Id.* at 62, 259–62,260 & n. 123.

The 2015 State of the Market Report for PJM focuses on the Monthly Balance of Planning Period FTR Auctions for the 2014 to 2015 and 2015 to 2016 planning periods, covering January 1, 2015, through December 31, 2015, and summarizes the Annual FTR Auction results for the 2015 to 2016 planning period.

Table 13-1 The FTR Auction Markets results were competitive

Market Element	Evaluation	Market Design
Market Structure	Competitive	
Participant Behavior	Competitive	
Market Performance	Competitive	Flawed

- Market structure was evaluated as competitive because the FTR auction is voluntary and the ownership positions resulted from the distribution of ARR and voluntary participation.
- Participant behavior was evaluated as competitive because there was no evidence of anti-competitive behavior.
- Market performance was evaluated as competitive because it reflected the interaction between participant demand behavior and FTR supply, limited by PJM's analysis of system feasibility.
- Market design was evaluated as flawed because there are significant flaws with the basic ARR/FTR design which need to be addressed. The market design is not an efficient way to ensure that congestion revenues are returned to load.

Overview

Auction Revenue Rights

Market Structure

- **ARR Allocations.** PJM's actions to address prior low levels of FTR revenue adequacy included PJM's assumption of higher outage levels and PJM's decision to include additional constraints (closed loop interfaces) both of which reduced system capability in the FTR auction model. PJM's actions led to a significant reduction in the allocation of Stage 1B and Stage 2 ARRs. ARR allocation quantities were significantly reduced from historic levels for both the 2014 to 2015 and 2015 to 2016 planning periods. For the 2014 to 2015 planning period, Stage 1B and Stage 2 ARR allocations were reduced 84.9 percent and 88.1 percent from

the 2013 to 2014 planning period. For the 2015 to 2016 planning period, Stage 1B and Stage 2 ARR allocations were reduced 79.7 percent from the 2013 to 2014 planning period.

- **Residual ARRs.** If ARR allocations are reduced as the result of a modeled transmission outage and the transmission outage ends during the relevant planning year, the result is that residual ARRs may be available. These residual ARRs are automatically assigned to eligible participants the month before the effective date. Residual ARRs are only available on paths prorated in Stage 1 of the annual ARR allocation, are only effective for single, whole months and cannot be self scheduled. Residual ARR clearing prices are based on monthly FTR auction clearing prices.

In the 2015 to 2016 planning period, PJM allocated a total of 26,845.4 MW of residual ARRs, up from 22,737.4 MW in the first seven months of the 2014 to 2015 planning period, with a total target allocation of \$7.5 million for the 2015 to 2016 planning period, down from \$9.0 million for the first seven months of the 2014 to 2015 planning period. Total Residual ARR allocations for the 2013 to 2014 planning period were 15,417.5 MW for \$4.7 million. This large increase in residual ARR allocations over the 2013 to 2014 planning period was primarily a result of PJM's significant reductions in Annual ARR Stage 1B allocations. The outages were only assumed in order to reduce the initial allocation. As a result, there were more available ARRs during the year which were distributed as residual ARRs.

- **ARR Reassignment for Retail Load Switching.** There were 53,343 MW of ARRs associated with \$503,400 of revenue that were reassigned in the 2014 to 2015 planning period. There were 43,089 MW of ARRs associated with \$504,600 of revenue that were reassigned for the first seven months of the 2015 to 2016 planning period.

Market Performance

- **Revenue Adequacy.** For the 2015 to 2016 planning period, the ARR target allocations, which are based on the nodal price differences from the Annual FTR Auction, were \$928.8 million, while PJM collected \$962.0 million from the combined Long Term, Annual and Monthly Balance of Planning Period

FTR Auctions, making ARRs revenue adequate. For the 2014 to 2015 planning period, the ARR target allocations were \$735.3 million while PJM collected \$767.9 million from the combined Long Term, Annual and Monthly Balance of Planning Period FTR Auctions. The increase in ARR target allocations and auction revenue, despite decreased volume, is a result of increased prices resulting from the reduced allocation of Stage 1B and Stage 2 ARRs. For the 2015 to 2016 planning period ARR dollars per MW increased 15.6 percent relative to the 2013 to 2014 planning period.

- **ARRs as an Offset to Congestion.** ARRs did not serve as an effective way to return congestion revenues to load. Total ARR and self scheduled FTR revenue offset only 63.8 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2014 to 2015 planning period. In the first seven months of the 2015 to 2016 planning period, total ARR and self scheduled FTR revenues offset 85.8 percent of total congestion costs.

Financial Transmission Rights

Market Structure

- **Supply.** The principal binding constraints limiting the supply of FTRs in the 2016 to 2019 Long Term FTR Auction include the Kenney – Stockton line in DPL and the Glenview – Kleeman line in DEOK. The principal binding constraints limiting the supply of FTRs in the Annual FTR Auction for the 2015 to 2016 planning period include the Bush – Lafayette flowgate in MISO and the Oakgrove – Galesburg flowgate in MISO.

Market participants can sell FTRs. In the 2016 to 2019 Long Term FTR Auction, total participant FTR sell offers were 327,980 MW, up from 240,748 in the 2015 to 2018 Long Term FTR Auction. In the 2015 to 2016 Annual FTR Auction, total participant sell offers were 378,744 MW, up from 271,368 MW in the 2014 to 2015 Annual FTR Auction. In the Monthly Balance of Planning Period FTR Auctions for the 2015 to 2016 planning period, total participant FTR sell offers were 3,495,474 MW, up from 2,424,369 MW for the same period during the 2014 to 2015 planning period.

- **Demand.** In the 2016 to 2019 Long Term FTR Auction, total FTR buy bids were 2,459,946 MW, down 21.3 percent from 3,124,613 MW the previous planning period. There were 2,461,662 MW of buy and self-scheduled bids in the 2015 to 2016 Annual FTR Auction, down 24.7 percent from 3,270,311 MW the previous planning period. The total FTR buy bids from the Monthly Balance of Planning Period FTR Auctions for the 2015 to 2016 planning period decreased 11.5 percent from 17,863,834 MW for the same time period of the prior planning period, to 15,813,526 MW.
- **Patterns of Ownership.** For the 2016 to 2019 Long Term FTR Auction, financial entities purchased 70.1 percent of prevailing flow FTRs and 78.5 percent of counter flow FTRs. For the 2015 to 2016 Annual FTR Auction, financial participants purchased 56.3 percent of all prevailing flow FTRs and 75.0 percent of all counter flow FTRs. For the Monthly Balance of Planning Period Auctions, financial entities purchased 74.9 percent of prevailing flow and 76.8 percent of counter flow FTRs for January through December of 2015. Financial entities owned 65.9 percent of all prevailing and counter flow FTRs, including 60.6 percent of all prevailing flow FTRs and 79.6 percent of all counter flow FTRs during the period from January through December 2015.

Market Behavior

- **FTR Forfeitures.** Total forfeitures for the 2015 to 2016 planning period were \$0.2 million for Increment Offers, Decrement Bids and UTC Transactions.
- **Credit Issues.** There were three collateral defaults and seven payment defaults for 2015. Two collateral defaults totaled \$710,300 and seven payment defaults totaled \$1,726,641 for Intergrid Mideast Group, LLC. There was one other collateral default for the first nine months of 2015 for \$35,000, which was promptly cured. There were no additional defaults in the last quarter of 2015.

PJM terminated Intergrid's membership as of April 23, 2015, and FERC approved PJM's termination as of June 23, 2015. Some of Intergrid's invoices were paid through Intergrid, a guarantor or cash collateral posted with PJM. Intergrid held FTRs at the time they were declared in default. PJM has liquidated all of Intergrid's FTR positions in accordance with Section

7.3.9 of the Operating Agreement.³ PJM liquidated 500.8 MW of Intergrid's FTRs in the June Monthly Balance of Planning Period Auction for a net of \$509,732 in revenue. PJM also liquidated 417.2 MW of Long Term FTRs for various planning periods for a net of \$230,318 in cost. The net revenue result of Intergrid's FTR liquidation is \$279,414. PJM has notified its Members that the Intergrid default will not result in any default allocation assessments in accordance with Section 15.2.2 of the Operating Agreement.⁴

Market Performance

- **Volume.** The 2016 to 2019 Long Term FTR Auction cleared 277,397 MW (11.3 percent) of demand of FTR buy bids, down 0.2 percent from 277,865 MW (8.9 percent) in the 2015 to 2018 Long Term FTR Auction. The Long Term FTR Auction also cleared 61,210 MW (18.7 percent) of FTR sell offers, compared to 34,629 (14.4 percent), a 76.8 percent increase.

In the Annual FTR Auction for the 2015 to 2016 planning period 378,328 MW (15.4 percent) of buy and self-schedule bids cleared, up 3.4 percent from 365,843 MW (10.4 percent) for the previous planning period. In the 2015 to 2016 planning period Monthly Balance of Planning Period FTR Auctions 1,466,985 MW (9.3 percent) of FTR buy bids and 803,463 MW (23.0 percent) of FTR sell offers cleared.

- **Price.** The weighted-average buy-bid FTR price in the 2016 to 2019 Long Term FTR Auction was \$0.05 per MW, up from \$0.04 per MW for the 2015 to 2018 planning period. The weighted-average buy-bid FTR price in the Annual FTR Auction for the 2015 to 2016 planning period was \$0.31 per MW, up from \$0.29 per MW in the 2014 to 2015 planning period. The weighted-average buy-bid cleared FTR price in the Monthly Balance of Planning Period FTR Auctions for the 2015 to 2016 planning period was \$0.25, up from \$0.16 per MW for the same period in the 2014 to 2015 planning period.
- **Revenue.** The 2016 to 2019 Long Term FTR Auction generated \$23.2 million of net revenue for all FTRs, up from \$9.0 million for the 2015 to 2018 Long

Term FTR Auction. The 2015 to 2016 Annual FTR Auction generated \$936.3 million in net revenue, up from \$748.6 million for the 2014 to 2015 Annual FTR Auction. The Monthly Balance of Planning Period FTR Auctions generated \$25.8 million in net revenue for all FTRs for the 2015 to 2016 planning period, up from \$12.5 million for the same time period in the 2014 to 2015 planning period.

- **Revenue Adequacy.** FTRs were paid at 100 percent of the target allocation level for the 2015 to 2016 planning period. This high level of revenue adequacy was primarily a result of actions taken by PJM to reduce the level of available ARRs and FTRs. PJM's actions included PJM's assumption of higher outage levels and PJM's decision to include additional constraints (closed loop interfaces) both of which reduced system capability in the FTR auction model. PJM's actions led to a significant reduction in the allocation of Stage 1B and Stage 2 ARRs.
- **Profitability.** FTR profitability is the difference between the revenue received for an FTR and the cost of the FTR. In 2015, FTRs were profitable overall, with \$453.5 million in profits for physical entities, of which \$325.9 million was from self-scheduled FTRs, and \$182.3 million for financial entities.

Markets Timeline

Any PJM member can participate in the Long Term FTR Auction, the Annual FTR Auction and the Monthly Balance of Planning Period FTR Auctions.

Table 13-2 shows the date of first availability and final closing date for all annual ARR and FTR products.

Table 13-2 Annual FTR product dates

Auction	Initial Open Date	Final Close Date
2016/2019 Long Term	6/1/2015	12/3/2015
2015/2016 ARR	3/2/2015	3/31/2015
2015/2016 Annual	4/7/2015	4/30/2015

Recommendations

- The MMU recommends that the ARR/FTR design be modified to ensure that all congestion revenues are returned to load. (Priority: High. New recommendation. Status: Not adopted.)

³ See PJM OATT, Liquidation of Financial Transmission Rights in the Event of Member Default, § 7.3.9.

⁴ See PJM OATT, Default Allocation Assessment § 15.2.2.

- The MMU recommends that all FTR auction revenue be distributed to ARR holders. (Priority: High. New recommendation. Status: Not adopted.)
- The MMU recommends that historical generation to load paths be eliminated as a basis for allocating ARRs. (Priority: High. New recommendation. Status: Not adopted.)
- The MMU recommends that counter flow FTRs be eliminated. (Priority: High. New recommendation. Status: Not adopted.)
- The MMU recommends that FTR auction revenues not be used to buy counter flow FTRs with the purpose of improving FTR payout ratios.⁵ (Priority: High. New recommendation. Status: Not adopted.)
- The MMU recommends that PJM report correct monthly payout ratios to reduce understatement of payout ratios on a monthly basis. (Priority: Low. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM eliminate portfolio netting to eliminate cross subsidies among FTR marketplace participants. (Priority: High. First reported 2012. Status: Not adopted. Pending before FERC.)
- The MMU recommends that PJM eliminate subsidies to counter flow FTRs by applying the payout ratio to counter flow FTRs in the same way the payout ratio is applied to prevailing flow FTRs. (Priority: High. First reported 2012. Status: Not adopted.)
- The MMU recommends that PJM eliminate geographic cross subsidies. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM improve transmission outage modeling in the FTR auction models. (Priority: Low. First reported 2013. Status: Adopted partially, 14/15 planning period.)
- The MMU recommends that PJM reduce FTR sales on paths with persistent overallocation of FTRs including clear rules for what defines persistent overallocation and how the reduction will be applied. (Priority: High. First reported 2013. Status: Adopted partially, 14/15 planning period.)
- The MMU recommends that PJM implement a seasonal ARR and FTR allocation system to better represent outages. (Priority: Medium. First reported 2013. Status: Not adopted.)
- The MMU recommends that the basis for the Stage 1A assignments be reviewed and made explicit, that the role of out of date generation to load paths be reviewed and that the building of the transmission capability required to provide all defined Stage 1A allocations be reviewed. (Priority: High. First reported 2013. Status: Not adopted.)
- The MMU recommends that PJM apply the FTR forfeiture rule to up to congestion transactions consistent with the application of the FTR forfeiture rule to increment offers and decrement bids. (Priority: High. First reported 2013. Status: Not adopted. Pending before FERC.)
- The MMU recommends that PJM examine the mechanism by which self scheduled FTRs are allocated when load switching among LSEs occurs throughout the planning period. (Priority: Low. First reported 2011. Status: Not adopted.)

Conclusion

The annual ARR allocation should be designed to return congestion revenues to firm transmission service customers, without requiring contract path physical transmission rights that are difficult or impossible to define and enforce in LMP markets. The fixed charges paid for firm transmission services result in the transmission system which provides physically firm transmission service which results in load paying congestion revenues.

After the introduction of LMP markets, financial transmission rights (FTRs) permitted the loads which pay for the transmission system to continue to receive those benefits in the form of revenues which offset congestion to the extent permitted by the transmission system. Financial transmission rights and the associated revenues were directly provided to loads in recognition of the fact that loads pay for the transmission system which permits low cost generation to be delivered to load. Another way of describing the result is that FTRs and the associated revenues were directly provided to loads in recognition of the fact that load pays locational prices which result in load payments in excess of generation revenues which are the source congestion revenues in an LMP market. In other words, load payments in excess

⁵ See PJM, "Manual 6: Financial Transmission Rights" Revision 16 (June 1, 2014), p. 56.

of generation revenues are the source of the funds to pay FTRs. In an LMP system, the only way to ensure that load receives the benefits associated with the use of the transmission system to deliver low cost energy is to use FTRs to pay back to load the difference between the total load payments and the total generation revenues, which equals total congestion revenues.

With the creation of ARRs, FTRs no longer serve their original function of providing firm transmission customers with the financial equivalent of physically firm transmission service. FTR holders, with the creation of ARRs, do not have the right to financially firm transmission service and FTR holders do not have the right to revenue adequacy.

As a result of the creation of ARRs and other changes to the design, the current ARR/FTR design does not serve as an efficient way to ensure that load receives all the congestion revenues or has the ability to receive the auction revenues associated with all the potential congestion revenues. Total ARR and self scheduled FTR revenue offset only 63.8 percent of total congestion costs including congestion in the Day-Ahead Energy Market and the balancing energy market for the 2014 to 2015 planning period.

For these reasons, load should never be required to subsidize payments to FTR holders, regardless of the reason. Such subsidies have been suggested repeatedly.⁶ One form of recommended subsidies would ignore balancing congestion when calculating total congestion dollars available to fund FTRs. This approach would ignore the fact that loads must pay both day-ahead and balancing congestion and that congestion is defined, in an accounting sense, to equal the sum of day ahead and balancing congestion. To eliminate balancing congestion from the FTR revenue calculation would require load to pay twice for congestion. Load would have to continue paying for the physical transmission system, would have to continue paying in excess of generator revenues and not have balancing congestion included in the calculation of congestion in order to increase the payout to holders of FTRs who are not loads and who therefore did not receive an allocation of ARRs. In other words, load would have to continue providing all the funding

of FTRs, while payments to FTR holders who did not receive ARRs exceed total congestion on their FTR paths and result in profits to FTR holders.

Revenue adequacy has received a lot of attention in the PJM FTR Market. There are several factors that can affect the reporting, distribution of and quantity of funding in the FTR Market. Revenue adequacy is misunderstood. FTR holders, with the creation of ARRs, do not have the right to financially firm transmission service and FTR holders do not have the right to revenue adequacy even when defined correctly. Load does have those rights based on load's payment for the transmission system and load's payment of total congestion.

Reported FTR revenue adequacy uses target allocations as the relevant benchmark. But target allocations are not the relevant benchmark. Target allocations are based on day-ahead congestion only, ignoring balancing congestion which is the other part of total congestion. FTR holders appropriately receive revenues based on actual congestion in both day-ahead and balancing markets. When day-ahead congestion differs significantly from real-time congestion, as has occurred only in recent years, this is evidence that there are reporting issues, cross subsidization issues, issues with the level of FTRs sold, and issues with modeling differences between the day-ahead and real-time markets. Such differences are not an indication that FTR holders are under paid.

The difference between the congestion payout using total congestion and the congestion payout using only day-ahead congestion illustrates the issue. For 2015, total day-ahead congestion was \$1,632.1 million while total day-ahead plus balancing congestion was \$1,385.3 million, compared to target allocations of \$1,231.3 million in the same time period.

PJM used a more conservative approach to modeling the transmission capability for the 2014 to 2015 planning period. PJM simply assumed higher outage levels and included additional constraints, both of which reduced system capability in the FTR auction model. The result was a significant reduction in Stage 1B and Stage 2 ARR allocations, and a corresponding reduction in the available quantity of FTRs, an increase in FTR prices and an increase in ARR target allocations. The market response to the reduced supply of FTRs was increased

⁶ See "FirstEnergy Solutions Corp. Allegheny Energy Supply Company, LLC v PJM Interconnection, LLC," Docket No. EL13-47-000 (February 15, 2013).

bid prices, increased clearing prices and reduced clearing quantities.

Clearing prices fell and cleared quantities increased from the 2010 to 2011 planning period through the 2013 to 2014 planning period. The market response to lower revenue adequacy was to reduce bid prices and to increase bid volumes and offer volumes. In the 2014 to 2015 and 2015 to 2016 planning periods, due to reduced ARR allocations, FTR volume decreased relative to the 2013 to 2014 planning period. The reduction in ARR allocations and resulting FTR volume caused, by definition, an improvement in revenue adequacy, and also resulted in an increase in the prices of FTRs. Increased FTR prices resulted in increased ARR target allocations, because ARR target allocations are based on the Annual FTR Auction nodal prices.

FTR target allocations are currently netted within each organization in each hour. This means that within an hour, positive and negative target allocations within an organization's portfolio are offset prior to the application of the payout ratio to the positive target allocation FTRs. The payout ratios are also calculated based on these net FTR positions. The current method requires those participants with fewer negative target allocation FTRs to subsidize those with more negative target allocation FTRs. The current method treats a positive target allocation FTR differently depending on the portfolio of which it is a part. The correct method would treat all FTRs with positive target allocations exactly the same, which would eliminate this form of cross subsidy. This should also be extended to include the end of planning period FTR uplift calculation. The net of a participant's portfolio should not determine their FTR uplift liability, rather their portion of total positive target allocations should be used to determine a participant's uplift charge. The FTR market cannot work efficiently if FTR buyers do not receive payments consistent with the performance of their FTRs. Eliminating the portfolio subsidy would be a good first step in that direction.

If netting within portfolios were eliminated and the payout ratio were calculated correctly, the payout ratio in the 2013 to 2014 planning period would have been 87.5 percent instead of the reported 72.8 percent. The MMU recommends that netting of positive and negative target allocations within portfolios be eliminated.

The current rules create an asymmetry between the treatment of counter flow and prevailing flow FTRs. Counter flow FTR holders make payments over the planning period, in the form of negative target allocations. These negative target allocations are paid at 100 percent regardless of whether positive target allocation FTRs are paid at less than 100 percent.

There is no reason to treat counter flow FTRs more favorably than prevailing flow FTRs. Counter flow FTRs should also be affected when the payout ratio is less than 100 percent. This would mean that counter flow FTRs would pay back an increased amount that mirrors the decreased payments to prevailing flow FTRs. The adjusted payout ratio would evenly divide the impact of lower payouts among counter flow FTR holders and prevailing flow FTR holders by increasing negative counter flow target allocations by the same amount it decreases positive target allocations. The FTR Market cannot work efficiently if FTR buyers do not receive payments consistent with the performance of their FTRs. Eliminating the counter flow subsidy would be another good step in that direction.

The result of removing portfolio netting and applying a payout ratio to counter flow FTRs would have increased the calculated payout ratio in the 2013 to 2014 planning period from the reported 72.8 percent to 91.0 percent. For the 2014 to 2015 planning period the payout ratio was 100 percent. The MMU recommends that counter flow and prevailing flow FTRs be treated symmetrically with respect to the application of a payout ratio.

The overallocation of Stage 1A ARRs results in FTR overallocations on the same facilities. Stage 1A ARR overallocation is a source of revenue inadequacy and cross subsidy. The origin and basis for the requirement to assign Stage 1A ARRs needs further investigation. The issues associated with over allocation appear to be based on the use of out of date generation to load ARR paths and on whether PJM has appropriately built transmission to meet the requirement.

The MMU recommends that the basis for the Stage 1A assignments be reviewed and made explicit, that the role of out of date generation to load paths be reviewed and that the building of the transmission capability required to provide all defined Stage 1A allocations be reviewed. The implementation of the MMU's recommendation

to return all congestion revenues to load would also significantly affect this issue.

The result of removing portfolio netting, applying a payout ratio to counter flow FTRs and eliminating Stage 1A ARR overallocation in the 2013 to 2014 planning period would have increased the payout ratio to 94.6 percent without reducing ARR allocations in Stage 1B and Stage 2.

In addition to addressing these issues, the approach to the question of FTR funding should also look at the fundamental reasons that there has been a significant and persistent difference between day-ahead and balancing congestion. These reasons include the inadequate transmission outage modeling in the FTR auction model which ignores all but long term outages known in advance; the different approach to transmission line ratings in the day-ahead and real-time markets, including reactive interfaces, which directly results in differences in congestion between day-ahead and real-time markets; differences in day-ahead and real-time modeling including the treatment of loop flows, the treatment of outages, the modeling of PARs and the nodal location of load, which directly results in differences in congestion between day-ahead and real-time markets; the overallocation of ARRs which directly results in a difference between congestion revenue and the payment obligation; the appropriateness of seasonal ARR allocations to better match actual market conditions with the FTR auction model; geographic subsidies from the holders of positively valued FTRs in some locations to the holders of consistently negatively valued FTRs in other locations; the contribution of up to congestion transactions to the differences between day-ahead and balancing congestion and thus to FTR payout ratios; and the continued sale of FTR capability on pathways with a persistent difference between FTRs and total congestion revenue. The MMU recommends that these issues be reviewed and modifications implemented. Regardless of how these issues are addressed, funding issues that persist as a result of modeling differences and flaws in the design of the FTR Market should be borne by FTR holders operating in the voluntary FTR market and not imposed on load through the mechanism of balancing congestion.

For the 2014 to 2015 and 2015 to 2016 planning periods FTRs have been revenue adequate. This is not because

the underlying problems have been fixed. Revenue adequacy has been accomplished by limiting the amount of available ARRs and FTRs by arbitrarily decreasing the ARR allocations for Stage 1B and Stage 2 which also results in a redistribution of ARRs based on differences in allocations between Stage 1A and Stage 1B ARRs.

Auction Revenue Rights

ARRs are the financial instruments through which the proceeds from FTR Auctions are allocated to load based on load's payment for the transmission system and for load's payment of congestion. ARR values are based on nodal price differences between the ARR source and sink points.⁷ These price differences are based on the bid prices of participants in the Annual FTR Auction. The auction clears the set of feasible FTR bids which produce the highest net revenue. ARR revenues are a function of FTR auction participants' expectations of locational congestion price differences and the associated level of revenue adequacy.

ARRs are available only as obligations (not options) and only as the 24-hour product. ARRs are available to the nearest 0.1 MW. The ARR target allocation is equal to the product of the ARR MW and the price difference between sink and source from the Annual FTR Auction. An ARR value can be positive or negative depending on the price difference between sink and source, with a negative difference resulting in a liability for the holder. The ARR target allocation represents the revenue that an ARR holder should receive. ARR credits can be positive or negative and can range from zero to the ARR target allocation. If the combined net revenues from the Long Term, Annual and Monthly Balance of Planning Period FTR Auctions are greater than the sum of all ARR target allocations, ARRs are fully funded. If these revenues are less than the sum of all ARR target allocations, available revenue is proportionally allocated among all ARR holders. If there are excess ARR revenues, the excess revenue is given pro rata to FTR holders.

The goal of the ARR/FTR design should be to provide an efficient mechanism to ensure that load receives all the congestion revenues, or has the ability to receive the auction revenues associated with all the potential

⁷ These nodal prices are a function of the market participants' annual FTR bids and binding transmission constraints. An optimization algorithm selects the set of feasible FTR bids that produces the most net revenue.

congestion revenues, all auction proceeds should be allocated to the ARR holders. The MMU recommends that all FTR auction proceeds be allocated to ARR holders.

When a new control zone is integrated into PJM, firm transmission customers in that control zone may choose to receive either an FTR allocation or an ARR allocation before the start of the Annual FTR Auction for two consecutive planning periods following their integration date. After the transition period, such participants receive ARRs from the annual allocation process and are not eligible for directly allocated FTRs. Network service users and firm transmission customers cannot choose to receive both an FTR allocation and an ARR allocation. This selection applies to the participant's entire portfolio of ARRs that sink into the new control zone. During this transitional period, the directly allocated FTRs are reallocated, as load shifts between LSEs within the transmission zone.

Incremental ARRs (IARRs) are allocated to customers that have been assigned cost responsibility for certain upgrades included in the PJM's Regional Transmission Expansion Plan (RTEP). These customers as defined in Schedule 12 of the Tariff are network service customers and/or merchant transmission facility owners that are assigned the cost responsibility for upgrades included in the PJM RTEP. PJM calculates IARRs for each regionally assigned facility and allocates the IARRs, if any are created by the upgrade, to eligible customers based on their percentage of cost responsibility. The customers may choose to decline the IARR allocation during the annual ARR allocation process.⁸ Each network service customer within a zone is allocated a share of the IARRs in the zone based on their share of the network service peak load of the zone.

Market Structure

ARRs have been available to network service and firm, point-to-point transmission service customers since June 1, 2003, when the annual ARR allocation was first implemented for the 2003 to 2004 planning period. The initial allocation covered the Mid-Atlantic Region and the AP Control Zone. For the 2006 to 2007 planning

period, the choice of ARRs or direct allocation FTRs was available to eligible market participants in the AEP, DAY, DLCO and Dominion control zones. For the 2007 to 2008 and subsequent planning periods through the present, all eligible market participants were allocated ARRs.

Supply and Demand

ARR supply is limited by the capability of the transmission system to simultaneously accommodate the set of requested ARRs and the numerous combinations of ARRs that are feasible. The top ten binding transmission constraints for the 2014 to 2015 planning period are shown in Table 13-3.

ARR Allocation

For the 2007 to 2008 planning period, the annual ARR allocation process was revised to include Long Term ARRs that would be in effect for 10 consecutive planning periods.⁹ Long Term ARRs can give LSEs the ability to offset their congestion costs on a long-term basis. Long Term ARR holders can self schedule their Long Term ARRs as FTRs for any planning period during the 10 planning period timeline.

Each March, PJM allocates ARRs to eligible customers in a three-stage process:

- Stage 1A.** In the first stage of the allocation, network transmission service customers can obtain ARRs, up to their share of the zonal base load, after taking into account generation resources that historically have served load in each control zone and up to 50 percent of their historical nonzone network load. Nonzone network load is load that is located outside of the PJM footprint. Firm, point-to-point transmission service customers can obtain Long Term ARRs, based on up to 50 percent of the MW of long-term, firm, point-to-point transmission service provided between the receipt and delivery points for the historical reference year. Stage 1A ARRs cannot be prorated. If Stage 1A ARRs are found to be infeasible, transmission system upgrades must be undertaken to maintain feasibility.¹⁰ While transmission upgrades are being implemented, Stage 1A ARRs, and therefore FTRs, are overallocated which can lead to revenue inadequacy.

⁸ PJM. "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), pp. 31 and "IARRs for RTEP Upgrades Allocated for 2011/2012 Planning Period," <<http://www.pjm.com/~media/markets-ops/fttr/annual-arr-allocation/2011-2012/iarrs-rtep-upgrades-allocated-for-2011-12-planning-period.aspx>>.

⁹ See the *2006 State of the Market Report* (March 8, 2007) for the rules of the annual ARR allocation process for the 2006 to 2007 and prior planning periods.

¹⁰ See PJM. "Manual 6: Financial Transmission Rights" Revision 16 (June 1, 2014), p. 22.

- **Stage 1B.** ARR unallocated in Stage 1A are available in the Stage 1B allocation for the following planning period. Network transmission service customers can obtain ARRs, up to their share of the zonal peak load, based on generation resources that historically have served load in each control zone and up to 100 percent of their transmission responsibility for nonzone network load. Firm, point-to-point transmission service customers can obtain ARRs based on the MW of long-term, firm, point-to-point service provided between the receipt and delivery points for the historical reference year. These long-term point-to-point service agreements must also remain in effect for the planning period covered by the allocation.
- **Stage 2.** Stage 2 of the annual ARR allocation is a three-step procedure, with one-third of the remaining system capability allocated in each step of the process. Network transmission service customers can obtain ARRs from any hub, control zone, generator bus or interface pricing point to any part of their aggregate load in the control zone or load aggregation zone for which an ARR was not allocated in Stage 1A or Stage 1B. Firm, point-to-point transmission service customers can obtain ARRs consistent with their transmission service as in Stage 1A and Stage 1B.

Prior to the start of the Stage 2 annual ARR allocation process, ARR holders can relinquish any portion of their ARRs resulting from the Stage 1A or Stage 1B allocation process, provided that all remaining outstanding ARRs are simultaneously feasible following the return of such ARRs.¹¹ Participants may seek additional ARRs in the Stage 2 allocation.

Effective for the 2015 to 2016 planning period, when residual zone pricing will be introduced, an ARR will default to sinking at the load settlement point, but the ARR holder may elect to sink their ARR at the physical zone instead.¹²

ARRs can also be traded between LSEs, but these trades must be made before the first round of the Annual FTR

Auction. Traded ARRs are effective for the full 12-month planning period.

When ARRs are allocated, all ARRs must be simultaneously feasible to ensure that the physical transmission system can support the approved set of ARRs. In making simultaneous feasibility determinations, PJM utilizes a power flow model of security-constrained dispatch that takes into account generation and transmission facility outages and is based on assumptions about the configuration and availability of transmission capability during the planning period.¹³ PJM may also adjust the outages modeled, adjust line limits and account for potential closed loop interfaces to address expected revenue inadequacies. The simultaneous feasibility requirement is necessary to ensure that there are adequate revenues from congestion charges to satisfy all resulting ARR obligations. If the requested set of ARRs is not simultaneously feasible, customers are allocated prorated shares in direct proportion to their requested MW and in inverse proportion to their impact on binding constraints, except Stage 1A ARRs:

Equation 13-1 Calculation of prorated ARRs

$$\text{Individual prorated MW} = (\text{Constraint capability}) \times (\text{Individual requested MW} / \text{Total requested MW}) \times (1 / \text{MW effect on line}).^{14}$$

The effect of an ARR request on a binding constraint is measured using the ARR's power flow distribution factor. An ARR's distribution factor is the percent of each requested MW of ARR that would have a power flow on the binding constraint. The PJM methodology prorates ARR requests in proportion to their MW value and the impact on the binding constraint. PJM's method results in the prorating only of ARRs that cause the greatest flows on the binding constraint. Were all ARR requests prorated equally, regardless of their proportional impact on the binding constraints, the result would be a significant reduction in market participants' ARRs.

Table 13-3 shows the top 10 principal binding transmission constraints that limited the 2015 to 2016 ARR Stage 1A allocation. PJM was required to increase

¹¹ See PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), pp. 21.

¹² See "Residual Zone Pricing," PJM Presentation to the Members Committee (February 23, 2012) <<http://www.pjm.com/~media/committees-groups/committees/mc/20120223/20120223-item-03-residual-zone-pricing-presentation.ashx>> The introduction of residual zone pricing, while approved by PJM members, depends on a FERC order.

¹³ PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), pp. 55-56.

¹⁴ See the *MMU Technical Reference for PJM Markets*, at "Financial Transmission Rights and Auction Revenue Rights," for an illustration explaining this calculation in greater detail. <http://www.monitoringanalytics.com/reports/Technical_References/references.shtml>

capability limits for several facilities in order to make the ARR allocation feasible.¹⁵

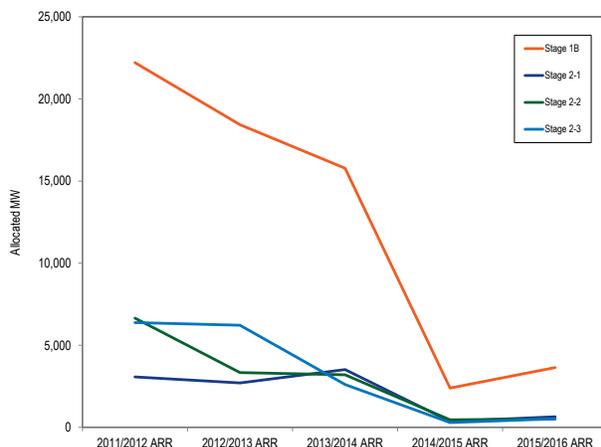
Table 13-3 Top 10 principal binding transmission constraints limiting the Annual ARR Allocation: Planning period 2015 to 2016

Constraint	Type	Control Zone
Breed - Wheatland	Flowgate	MISO
Wheatland - Petersburg	Flowgate	MISO
Wempletown	Transformer	ComEd
Nelson - Electric Junction	Flowgate	MISO
Cherry Valley - Silverlake	Flowgate	MISO
Pana North	Flowgate	MISO
Nelson - Cordova	Line	ComEd
Pana North	Flowgate	MISO
Cherry Valley	Transformer	ComEd
Pontiac Midpoint - Wilton Ctr.	Flowgate	ComEd

FTR Revenue Adequacy and Stage 1B/Stage 2 ARR Allocations

For the entire 2014 to 2015 and 2015 to 2016 planning periods, FTR revenue adequacy was over 100 percent. Not every month was revenue adequate, but there was excess revenue from other months to make each month revenue adequate. The last time there were four months of consecutive funding of 100 percent or more was in the 2009 to 2010 planning period.

Figure 13-1 Historic Stage 1B and Stage 2 ARR Allocations from the 2011 to 2012 through 2015 to 2016 planning period



¹⁵ It is a requirement of Section 7.4.2 (i) in the OATT that any ARR request made in Stage 1A must be feasible and transmission capability must be raised if an ARR request is found to be infeasible.

This high level of revenue adequacy was primarily due to actions taken by PJM to address prior low levels of revenue adequacy. PJM's actions included PJM's arbitrary assumption of higher outage levels and PJM's decision to include additional constraints (closed loop interfaces) both of which reduced system capability in the FTR auction model. PJM's actions led to a significant reduction in the allocation of Stage 1B and Stage 2 ARRs.

While PJM's approach to outages in the Annual FTR Auction reduces revenue inadequacy, which was caused in part by Stage 1A ARR overallocations, it does not address the Stage 1A ARR overallocation issue directly, and has resulted in decreased Stage 1B ARR allocations through proration, decreased Stage 2 ARR allocations through proration and decreased FTR capability. Stage 1A ARRs were not affected by PJM's assumption of increased outages because they may not be prorated.

Figure 13-1 shows the historic allocations for Stage 1B and Stage 2 ARRs from the 2011 to 2012 to 2015 to 2016 planning periods. There was an 84.9 percent decrease in Stage 1B ARRs allocated and an 88.1 percent decrease in total Stage 2 ARR allocations from the 2013 to 2014 planning period to the 2014 to 2015 planning period. Total Stage 1B and Stage 2 ARR allocations increased in the 2015 to 2016 planning year over the 2014-2015 planning year allocations, from 4,605.6 MW to 6,996.1 MW. But the ARR allocations for the 2015-2016 planning year were still 79.7 percent below 2013 to 2014 planning year volumes of 34,444.0 MW. The dollars per ARR MW for the first seven months of the 2014 to 2015 and 2015 to 2016 planning periods were up 68.5 percent and 15.6 percent relative to the 2013 to 2014 planning period while congestion was up by only 33.6 percent and 25.8 percent relative to the first seven months of the 2013 to 2014 planning period.

Table 13-4 shows the ARR allocations for the 2011 to 2012 through 2015 to 2016 planning periods. Stage 1A allocations cannot be prorated and have been slowly increasing. Stage 1B and Stage 2 allocations can be prorated. Stage 1B and Stage 2 allocations were steadily declining over the 2011 to 2012 through 2013 to 2014 planning periods, but were very significantly reduced in the 2014 to 2015 planning period as a result of PJM's arbitrary increase in modeled outages designed to increase revenue adequacy. There was a small increase

in Stage 1B and Stage 2 ARR volume from the 2014 to 2015 planning period to the 2015 to 2016 planning period.

Table 13-4 Historic Stage 1B and Stage 2 ARR Allocations from the 2011 to 2012 through 2015 to 2016 planning periods

Stage	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016
	ARR	ARR	ARR	ARR	ARR
Stage 1A	64,159.9	67,299.6	67,861.4	68,837.7	71,874.0
Stage 1B	22,208.3	18,431.7	15,782.0	2,389.6	3,643.1
Stage 2-1	3,072.5	2,700.6	3,519.2	360.9	643.8
Stage 2-2	6,652.6	3,334.3	3,200.0	455.9	511.2
Stage 2-3	6,382.6	6,218.7	2,611.8	291.2	521.5
Total Stage 2	16,107.7	12,253.6	9,331.0	1,108.0	1,676.5

ARR Reassignment for Retail Load Switching

PJM rules provide that when load switches between LSEs during the planning period, a proportional share of associated ARRs that sink into a given control or load aggregation zone is automatically reassigned to follow that load.¹⁶ ARR reassignment occurs daily only if the LSE losing load has ARRs with a net positive economic value to that control zone. An LSE gaining load in the same control zone is allocated a proportional share of positively valued ARRs within the control zone based on the shifted load. ARRs are reassigned to the nearest 0.001 MW and any MW of load may be reassigned multiple times over a planning period. Residual ARRs are also subject to the rules of ARR reassignment. This practice supports competition by ensuring that the offset to congestion follows load, thereby removing a barrier to competition among LSEs and, by ensuring that only ARRs with a positive value are reassigned, preventing an LSE from assigning poor ARR choices to other LSEs. However, when ARRs are self-scheduled as FTRs, these underlying self-scheduled FTRs do not follow load that shifts while the ARRs do follow load that shifts, and this may result in lower value of the ARRs for the receiving LSE compared to the total value held by the original ARR holder.

There were 53,343 MW of ARRs associated with \$503,400 of revenue that were reassigned in the 2014 to 2015 planning period. There were 43,089 MW of ARRs associated with \$504,600 of revenue that were reassigned for the 2015 to 2016 planning period.

¹⁶ See PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), p. 28.

Table 13-5 summarizes ARR MW and associated revenue automatically reassigned for network load in each control zone where changes occurred between June 2014 and December 2015.

Table 13-5 ARRs and ARR revenue automatically reassigned for network load changes by control zone: June 1, 2014, through December 31, 2015

Control Zone	ARRs Reassigned (MW-day)		ARR Revenue Reassigned [Dollars (Thousands) per MW-day]	
	2014/2015	2015/2016	2014/2015	2015/2016
	(12 months)	(7 months)*	(12 months)	(7 months)*
AECO	539	462	\$3.1	\$3.5
AEP	2,453	6,657	\$37.5	\$66.9
AP	2,351	1,709	\$50.9	\$40.9
ATSI	8,627	4,625	\$70.8	\$42.3
BGE	3,264	2,557	\$52.7	\$81.1
ComEd	6,720	3,478	\$94.9	\$87.2
DAY	794	417	\$1.1	\$0.8
DEOK	6,490	5,821	\$13.8	\$27.9
DLCO	5,891	4,245	\$10.9	\$9.0
DPL	1,853	1,289	\$30.5	\$45.7
Dominion	20	20	\$0.3	\$0.3
EKPC	0	0	\$0.0	\$0.0
JCPL	1,354	1,138	\$9.5	\$8.8
Met-Ed	1,018	858	\$11.2	\$7.4
PECO	2,949	3,554	\$27.1	\$19.3
PENELEC	1,019	906	\$15.4	\$15.8
PPL	3,953	2,578	\$20.6	\$14.0
PSEG	1,510	1,059	\$36.8	\$25.4
Pepco	2,486	1,676	\$16.3	\$8.3
RECO	49	42	\$0.0	\$0.0
Total	53,343	43,089	\$503.4	\$504.6

* Through 31-December-2015

Incremental ARRs (IARRs) for RTEP Upgrades

Table 13-6 lists the incremental ARR allocation volume for the planning periods from the 2008 to 2009 planning period through the 2015 to 2016 planning period.

Table 13-6 Incremental ARR allocation volume: Planning periods 2008 to 2009 through 2015 to 2016

Planning Period	Requested Count	Bid and Requested		Cleared Volume	Uncleared	
		Volume (MW)	Volume (MW)		Volume (MW)	Volume
2008/2009	15	890.5	890.5	100%	0	0%
2009/2010	14	530.5	530.5	100%	0	0%
2010/2011	14	531.0	531.0	100%	0	0%
2011/2012	15	595.0	595.0	100%	0	0%
2012/2013	15	687.4	687.4	100%	0	0%
2013/2014	17	1,087.4	1,087.4	100%	0	0%
2014/2015	18	1,447.4	1,447.4	100%	0	0%
2015/2016	18	1,290.5	1,290.5	100%	0	0%

Table 13-7 lists the three RTEP upgrade projects that were allocated a total of 678.2 MW of IARRs for the 2015 to 2016 planning period.

Table 13–7 IARRs allocated for the 2015 to 2016 Annual ARR Allocation for RTEP upgrades

Project #	Project Description	IARR Parameters			Total MW
		Source	Sink		
B0287	Install 600 MVAR Dynamic Reactive Device at Elroy 500kV	RTEP B0287 Source	DPL		190.6
B0328	TrAIL Project: 502 JCT - Loudoun 500kV	RTEP B0328 Source	Pepco		391.2
B0329	Cason-Suffolk 500 kV	RTEP B0329 Source	Dominion		96.4

Residual ARRs

Only ARR holders that had their Stage 1 ARRs prorated are eligible to receive Residual ARRs. Residual ARRs are available if additional transmission system capability is added during the planning period after the annual ARR allocation. This additional transmission system capability would not have been accounted for in the initial annual ARR allocation, but it enables the creation of residual ARRs. Residual ARRs are effective on the first day of the month in which the additional transmission system capability is included in FTR auctions and exist until the end of the planning period. For the following planning period, any Residual ARRs are available as ARRs in the annual ARR allocation. Stage 1 ARR holders have a priority right to ARRs. Residual ARRs are a separate product from incremental ARRs.

Effective August 1, 2012, Residual ARRs are also available for eligible participants when a transmission outage was modeled in the Annual ARR Allocation, but the transmission facility becomes available during the modeled year. Residual ARRs awarded due to outages are effective for single, whole months and cannot be self scheduled. ARR target allocations are based on the clearing prices from FTR obligations in the effective monthly auction, may not exceed zonal network services peak load or firm transmission reservation levels and are only available up to the prorated ARR MW capacity as allocated in the Annual ARR Allocation.

Table 13-8 shows the Residual ARRs automatically allocated to eligible participants, along with the target allocations from the effective month. In the first seven months of the 2015 to 2016 planning period, PJM allocated a total of 19,409.44 MW of residual ARRs, up from 15,096.9 MW for the first seven months of the 2014 to 2015 planning period. Residual ARRs had a total target allocation of \$5.9 million for the first seven months of the 2015 to 2016 planning period, down from \$6.6 million for the first seven months of the 2014 to 2015 planning period consistent with a decrease in Monthly Balance of Planning Period Auction prices

from the previous year. Some ARRs that were previously allocated in Stage 1B are now being allocated as Residual ARRs on a month to month basis without the option to self schedule.

Table 13–8 Residual ARR allocation volume and target allocation: 2015

Month	Bid and Requested Volume (MW)	Cleared Volume (MW)	Cleared Volume	Target Allocation
Jan-15	4,068.7	1,559.2	38.3%	\$454,212
Feb-15	3,685.7	1,536.9	41.7%	\$492,060
Mar-15	7,930.9	1,735.0	21.9%	\$387,576
Apr-15	4,882.1	1,676.7	34.3%	(\$11,359)
May-15	3,505.4	928.2	26.5%	\$267,930
Jun-15	5,513.9	1,775.9	32.2%	\$394,951
Jul-15	4,859.7	3,047.7	62.7%	\$1,563,502
Aug-15	4,142.6	2,932.5	70.8%	\$1,071,790
Sep-15	3,393.8	2,850.9	84.0%	\$973,555
Oct-15	3,690.4	2,553.8	69.2%	\$651,586
Nov-15	8,784.6	3,643.7	41.5%	\$562,507
Dec-15	4,152.6	2,604.9	62.7%	\$650,267
Total	58,610.4	26,845.4	45.8%	\$7,458,577

Market Performance

Volume

Table 13-9 shows the volume of ARR allocations for each round of the 2014 to 2015 and 2015 to 2016 planning periods. The percentage cleared increased slightly in the 2015 to 2016 planning period from the prior planning period.

Table 13-9 Annual ARR Allocation volume: planning periods 2014 to 2015 and 2015 to 2016

Planning Period	Stage	Round	Requested		Cleared		Uncleared	
			Count	Volume (MW)				
2014/2015	1A	0	19,287	68,843	68,838	100.0%	5	0.0%
		1	14,235	35,104	2,390	6.8%	32,714	93.2%
	2	2	5,517	27,708	361	1.3%	27,347	98.7%
		3	5,817	27,914	456	1.6%	27,458	98.4%
	4	5,381	27,953	291	1.0%	27,662	99.0%	
Total			16,715	83,575	1,108	1.3%	82,467	98.7%
Total			50,237	187,522	72,336	38.6%	115,186	61.4%
2015/2016	1A	0	21,508	71,874	71,874	100.0%	0	0.0%
		1	14,915	38,848	3,643	9.4%	35,205	90.6%
	2	2	5,849	26,710	644	2.4%	26,066	97.6%
		3	4,773	25,900	511	2.0%	25,389	98.0%
	4	4,326	25,986	522	2.0%	25,464	98.0%	
Total			14,948	78,596	1,677	2.1%	76,919	97.9%
Total			51,371	189,318	77,194	40.8%	112,124	59.2%

Stage 1A Infeasibility

Stage 1A ARRs are allocated for a 10 year period, with the ability for a participant to opt out of any planning period. PJM conducts a simultaneous feasibility analysis to determine the transmission upgrades required so that the long term ARRs can remain feasible. If a simultaneous feasibility test violation occurs in any year, PJM will identify or accelerate any transmission upgrades to resolve the violation and these upgrades will be recommended for inclusion in the PJM RTEP process.¹⁷

For the 2015 to 2016 planning period, Stage 1A of the Annual ARR Allocation was infeasible. As a result, modeled system capability, in excess of actual system capability, was provided to the Stage 1A ARRs and added to the FTR auction. According to Section 7.4.2 (i) of the PJM OATT, the capability limits of the binding constraints rendering these ARRs infeasible must be increased in the model and these increased limits must be used in subsequent ARR and FTR allocations and auctions for the entire planning period, except in the case of extraordinary circumstances.

The result of this required increased of capability in the models is an overallocation of both ARRs and FTRs for the entire planning period and an associated reduction in ARR and FTR funding.

In order to eliminate the infeasibilities for the requested Stage 1A ARR allocations, PJM was required to raise

the modeled capacity limits on 84 facilities, 24 of which were internal to PJM, a total of 6,271 MW.¹⁸

Figure 13-2 shows the predicted and estimated impact of Stage 1A infeasibilities on funding for the 2012 to 2013 through 2014 to 2015 planning periods, as well as the predicted impact on funding for the 2015 to 2016 planning period. The predicted funding is based on the infeasible ARR MW and the nodal price of the source and sink in the Annual FTR Auction. The estimated funding is calculated assuming every infeasible ARR MW is self scheduled, and uses the hourly

congestion LMP values. In the 2014 to 2015 planning period Stage 1A ARR infeasibilities accounted for \$105.9 million in over allocation.

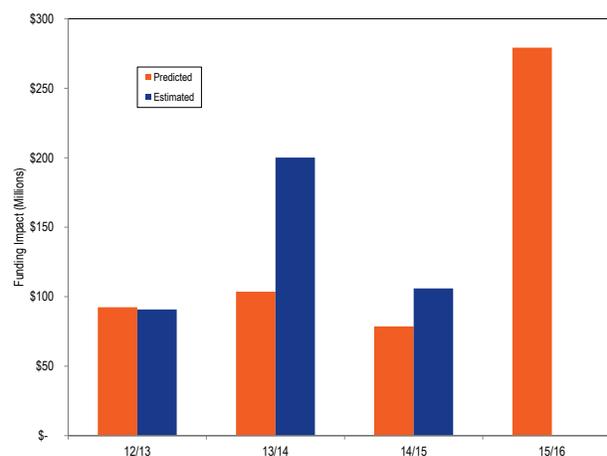
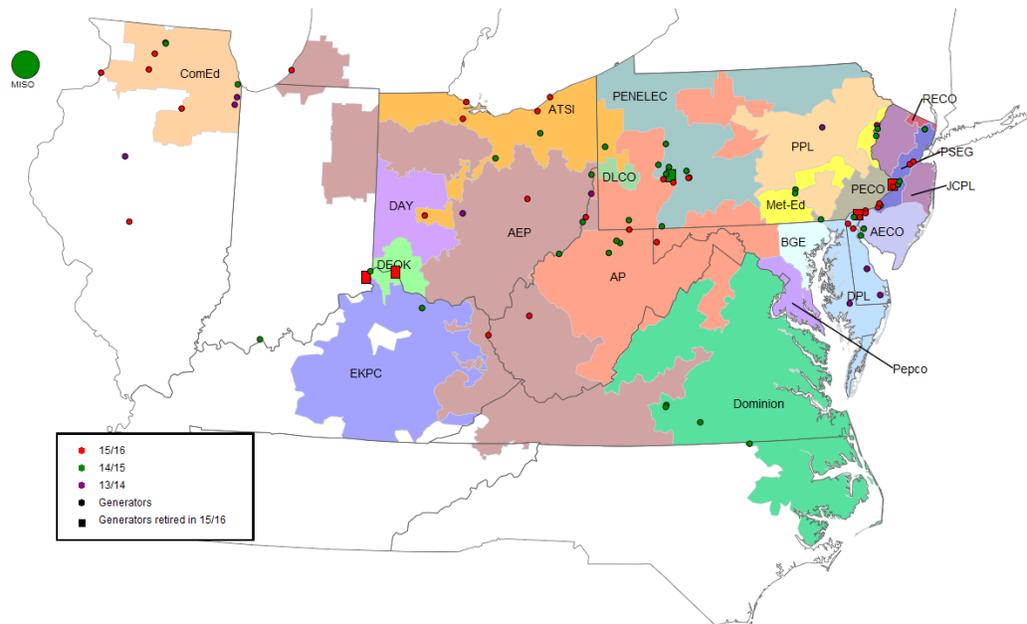
Figure 13-2 Stage 1A Infeasibility Funding Impact

Figure 13-3 shows a map of over allocated ARR source points in Stage 1A, regardless of reason, for the 2013 to 2014 through 2015 to 2016 planning period. The year indicated for each source point is the latest year that source was announced as over allocated in the Stage 1A process. Generators retired as of the 2015 to 2016 planning period are indicated by a square marker to show Stage 1A source points that are no longer in service for the most recent Stage 1A allocation period.

17 PJM. "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), p.22.

18 PJM 2015/2016 Stage 1A Over allocation notice, PJM FTRs, <<http://www.pjm.com/~media/markets-ops/ftr/annual-arr-allocation/2015-2016/2015-2016-stage-1a-over-allocation-notice.ashx>> (March 5, 2015).

Figure 13-3 Overalllocated Stage 1A ARR source points



Revenue

ARRs are allocated to qualifying customers rather than sold, so there is no ARR revenue comparable to the revenue that results from the FTR auctions.

Revenue Adequacy

As with FTRs, revenue adequacy for ARRs must be distinguished from the adequacy of ARRs as an offset to total congestion. Revenue adequacy is a narrower concept that compares the revenues available to ARR holders to the value of ARRs as determined in the Annual FTR Auction. ARRs have been revenue adequate for every auction to date. Customers that self schedule ARRs as FTRs have the same revenue adequacy characteristics as all other FTRs.

The adequacy of ARRs as an offset to total congestion compares ARR revenues to total congestion sinking in the participant's load zone as a measure of the extent to which ARRs offset market participants' actual, total congestion into their zone. Customers that self schedule ARRs as FTRs provide the same offset to congestion as all other FTRs.

ARR holders received a projected \$767.9 million in credits from the FTR auctions during the 2014 to 2015 planning period. The FTR auction revenue collected

pays ARR holders' credits. During the 2014 to 2015 planning period, ARR holders received \$735.3 million in ARR credits.

Table 13-10 lists projected ARR target allocations from the Annual ARR Allocation and net revenue sources from the Annual and Monthly Balance of Planning Period FTR Auctions for the 2014 to 2015 planning period and the 2015 to 2016 planning periods. As seen here, due to decreased FTR volume leading to increased FTR nodal prices, auction revenue increased 24.5 percent while projected ARR target allocations increased 26.1 percent from the previous planning period.

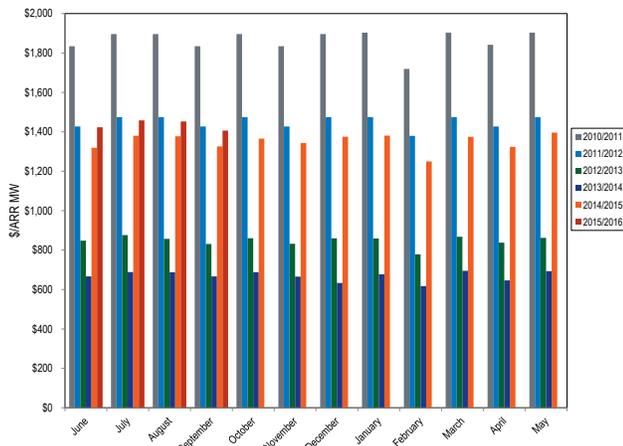
Table 13-10 Projected ARR revenue adequacy (Dollars (Millions)): Planning periods 2014 to 2015 and 2015 to 2016

	2014/ 2015	2015/ 2016
Total FTR auction net revenue	\$767.9	\$962.0
Annual FTR Auction net revenue	\$748.6	\$936.3
Monthly Balance of Planning Period FTR Auction net revenue*	\$19.3	\$25.8
ARR target allocations	\$735.3	\$928.8
ARR credits	\$735.3	\$928.8
Surplus auction revenue	\$32.6	\$33.2
ARR payout ratio	100%	100%
FTR payout ratio*	100%	100%

* Shows twelve months for 2014/2015 and seven months for 2015/2016.

Figure 13-4 shows the dollars per ARR MW held for each month of the 2010 to 2011 through 2015 to 2016 planning periods. The ARR MW held do not include self-scheduled FTRs and do include Residual ARRs starting in August 2012. FTR prices increased in the 2014 to 2015 Annual FTR Auction as a result of reduced supply caused by PJM’s assumption of more outages in the model used to allocate Stage 1B and Stage 2 ARRs. The increased FTR prices resulted in an increase in dollars paid per ARR MW. For the 2014 to 2015 planning period, the total dollars per MW of ARR allocation was \$11,279, while the previous planning period resulted in a dollars per MW of \$6,692, a 68.5 percent increase in payment per allocated ARR MW. Some of the ARR MW lost from proration were provided in the Residual ARR process, but the residual allocations are not comparable to the ARRs awarded in the annual process because residual ARR allocations change each month and cannot be self-scheduled as FTRs. For the first seven months of the 2015 to 2016 planning period, the dollars per MW of ARR allocation was \$7,739.36.

Figure 13-4 Dollars per ARR MW paid to ARR holders: Planning periods 2010 to 2011 through 2015 to 2016

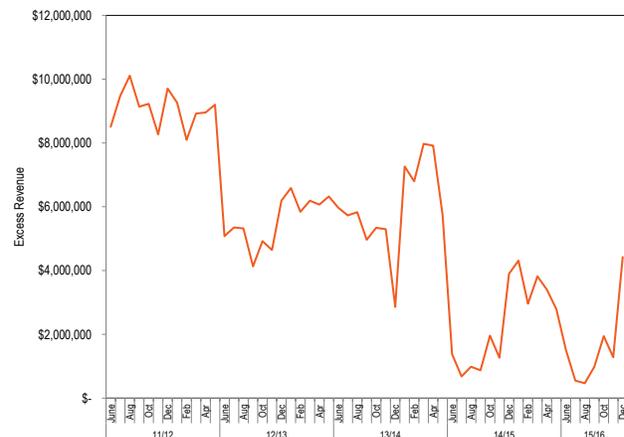


Excess ARR Revenue

Figure 13-5 shows the monthly excess ARR revenue from the 2011 to 2012 through 2015 to 2016 planning periods. Excess ARR revenue is the revenue collected each month from FTR auctions in excess of ARR target allocations after PJM’s implemented counter flow FTR clearing process. Stage 1A ARRs may be over allocated in the initial Stage 1A process, which requires that facility limits are increased above their actual capability.

These increased facility limits must be carried over into the FTR auctions, which results in an over selling of FTR MW. Beginning with the 2014 to 2015 planning period, market rules allow PJM to decrease prevailing flow target allocations by clearing counter flow FTRs, without making the opposite prevailing flow FTR available, as long as ARRs remain revenue adequate. This allows PJM to use the excess ARR revenue to pay prevailing flow FTRs without increasing prevailing flow obligations. This action removes money from the excess ARR revenue stream and caused the large decrease in excess ARR revenue beginning in June 2014. Currently, excess FTR auction revenue is allocated pro rata to FTR holders at the end of the planning period, instead of being distributed to ARR holders.

Figure 13-5 Monthly excess ARR revenue: Planning periods 2011 to 2012 through 2015 to 2016



Financial Transmission Rights

FTRs are financial instruments that entitle their holders to receive revenue or require them to pay charges based on locational congestion price differences in the Day-Ahead Energy Market across specific FTR transmission paths, subject to revenue availability. This value, termed the FTR target allocation, defines the maximum, but not guaranteed, payout for FTRs. The target allocation of an FTR reflects the difference in congestion prices rather than the difference in LMPs, which includes both congestion and marginal losses.

Auction market participants are free to request FTRs between any eligible pricing nodes on the system. For the Long Term FTR Auction a list of available hubs,

control zones, aggregates, generator buses and interface pricing points is available. For the Annual FTR Auction and FTRs bought for a quarterly period in the monthly auction the available FTR source and sink points include hubs, control zones, aggregates, generator buses, load buses and interface pricing points. An FTR bought in the Monthly FTR Auction for the single calendar month following the auction may include any bus for which an LMP is calculated in the FTR model used. As one of the measures to address FTR funding, effective August 5, 2011, PJM does not allow FTR buy bids to clear with a price of zero unless there is at least one constraint in the auction which affects the FTR path. FTRs are available to the nearest 0.1 MW. The FTR target allocation is calculated hourly and is equal to the product of the FTR MW and the congestion price difference between sink and source that occurs in the Day-Ahead Energy Market. The target allocation of an FTR can be positive or negative depending on the sink minus source congestion price difference, with a negative difference resulting in a liability for the holder. FTR holders with a negatively valued FTR are required to pay charges equal to their target allocations. The FTR target allocation is a cap on what FTR holders can receive. Revenues above that level on individual FTR paths are used to fund FTRs on paths which received less than their target allocations.

Available revenue to pay FTR holders is based on the amount of day-ahead and balancing congestion collected, payments by holders of negatively valued FTRs, Market to Market payments, excess ARR revenues available at the end of a month and any charges made to day-ahead operating reserves. Depending on the amount of revenues collected, FTR holders with a positively valued FTR may receive congestion credits between zero and their target allocations.

FTR funding is not on a path specific basis or on a time specific basis. There are widespread cross subsidies paid to equalize payments across paths and across time periods within a planning period. All paths receive the same proportional level of target revenue at the end of the planning period. FTR auction revenues and excess revenues are carried forward from prior months and distributed back from later months. At the end of a planning period, if some months remain not fully funded, an uplift charge is collected from any FTR market participants that hold FTRs for the planning period based on their pro rata share of total net positive FTR

target allocations, excluding any charge to FTR holders with a net negative FTR position for the planning year.

FTRs can be bought, sold and self scheduled. Buy bids are bids to buy FTRs in the auctions; sell offers are offers to sell existing FTRs in the auctions; and self-scheduled bids are FTRs that have been directly converted from ARRs in the Annual FTR Auction.

There are two types of FTR products: obligations and options. An obligation provides a credit, positive or negative, equal to the product of the FTR MW and the congestion price difference between FTR sink (destination) and source (origin) that occurs in the Day-Ahead Energy Market. An option provides only positive credits and options are available for only a subset of the possible FTR transmission paths.

There are three classes of FTR products: 24-hour, on peak and off peak. The 24-hour products are effective 24 hours a day, seven days a week, while the on peak products are effective during on peak periods defined as the hours ending 0800 through 2300, Eastern Prevailing Time (EPT) Mondays through Fridays, excluding North American Electric Reliability Council (NERC) holidays. The off peak products are effective during hours ending 2400 through 0700, EPT, Mondays through Fridays, and during all hours on Saturdays, Sundays and NERC holidays.

PJM operates an Annual FTR Auction for all participants. In addition, PJM conducts Monthly Balance of Planning Period FTR Auctions for the remaining months of the planning period, which allows participants to buy and sell residual transmission capability. PJM also runs a Long Term FTR Auction for the following three consecutive planning years. FTR options are not available in the Long Term FTR Auction. A secondary bilateral market is also administered by PJM to allow participants to buy and sell existing FTRs. FTRs can also be exchanged bilaterally outside PJM markets.

The objective function of all FTR auctions is to maximize the bid-based value of FTRs awarded in each auction.

FTR buy bids and sell offers may be made as obligations or options and as any of the three classes. FTR self-scheduled bids are available only as obligations and

24-hour class, consistent with the associated ARRs, and only in the Annual FTR Auction.

Supply and Demand

PJM oversees the process of selling and buying FTRs through ARR Allocations and FTR Auctions. Market participants purchase FTRs by participating in Long Term, Annual and Monthly Balance of Planning Period FTR Auctions.¹⁹ FTRs can also be traded between market participants through bilateral transactions. ARRs may be self scheduled as FTRs for participation only in the Annual FTR Auction.

Total FTR supply is limited by the capability of the transmission system, as modeled in the Annual ARR Allocation. Stage 1A ARR requests must be granted, which artificially increases the capacity of the model on those facilities affected by the over allocated Stage 1A ARR requests. The capacity modeled in the Annual ARR Allocation is used as the capacity for the Annual FTR Auction to simultaneously accommodate the requested FTRs and the various combinations of requested FTRs. Depending on assumptions used in the auction transmission model, the total FTR supply can be greater than or less than system capability in aggregate and/or on an element by element basis. When FTR supply is greater than system capability, FTR target allocations will be greater than congestion revenues, contributing to FTR revenue inadequacy. Where FTR supply is less than system capability, FTR target allocations will be less than congestion revenues, contributing to FTR revenue surplus.

PJM can also make further adjustments to the auction model to address expected revenue inadequacies. PJM can assume higher outage levels and PJM can decide to include additional constraints (closed loop interfaces) both of which reduce system capability in the auction model. These PJM actions reduce the supply of available Stage 1B and Stage 2 ARRs, which in turn reduce the number of FTRs available for purchase. PJM made such adjustments in the 2014 to 2015 and 2015 to 2016 planning year auction model.

For the Annual FTR Auction, known transmission outages that are expected to last for two months or more

may be included in the model, while known outages of five days or more may be included in the model for the Monthly Balance of Planning Period FTR Auctions as well as any outages of a shorter duration that PJM determines would cause FTR revenue inadequacy if not modeled.²⁰ The full list of outages selected is publicly posted, but the process by which these outages are selected is not fully explained and PJM exercises significant discretion in selecting outages to accomplish FTR revenue adequacy.

But the auction process does not account for the fact that significant transmission outages, which have not been provided to PJM by transmission owners prior to the auction date, will occur during the periods covered by the auctions. Such transmission outages may or may not be planned in advance or may be emergency outages. In addition, it is difficult to model in an annual auction two outages of similar significance and similar duration in different areas which do not overlap in time. The choice of which to model may have significant distributional consequences. The fact that outages are modeled at significantly lower than historical levels results in selling too many FTRs which creates downward pressure on revenues paid to each FTR. To address this issue, the MMU has recommended that PJM use probabilistic outage modeling and seasonal ARR/FTR markets to better align the supply of ARRs and FTRs with actual system capabilities.

Long Term FTR Auctions

PJM conducts a Long Term FTR Auction for the next three consecutive planning periods. The capacity offered for sale in Long Term FTR Auctions is the residual system capability assuming that all ARRs allocated in the prior annual ARR allocation process are self scheduled as FTRs. These ARRs are modeled as fixed injections and withdrawals in the Long Term FTR Auction. Future transmission upgrades are not included in the model. The 2009 to 2012 and 2010 to 2013 Long Term FTR Auctions consisted of two rounds.²¹ The 2011 to 2014 and 2012 to 2015 Long Term FTR Auctions consisted of three rounds. FTRs purchased in prior rounds may be offered for sale in subsequent rounds. FTRs obtained

²⁰ See PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), p. 55.

²¹ FERC approved, on December 7, 2009, the addition of a third round to the Long Term FTR Auction. FERC letter order accepting PJM Interconnection, LLC's revisions to Long-Term Financial Transmission Rights Auctions to its Amended and Restated Operating Agreement and Open Access Transmission Tariff, Docket No. ER10-82-000 (December 7, 2009).

¹⁹ See PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), p. 38.

in the Long Term Auctions may have terms of any one year or a single term of all three years. FTR products available in the Long Term Auction include 24-hour, on peak and off peak FTR obligations. FTR option products are not available in Long Term FTR Auctions.

- **Round 1.** The first round is conducted in the June prior to the start of the term covered by the Long Term FTR Auction. Market participants make offers for FTRs between any source and sink.
- **Round 2.** The second round is conducted approximately three months after the first round and follows the same rules as Round 1.
- **Round 3.** The third round is conducted approximately six months after the first round and follows the same rules as Round 1.

Table 13-11 and Table 13-12 show the top 10 binding constraints for the 2016 to 2018 Long Term FTR Auction and the 2015 to 2016 Annual FTR Auction based on the marginal value of on peak hours. The severity ranking is based on the marginal value of the constraint in the simultaneous feasibility test.

Table 13-11 Top 10 principal binding transmission constraints limiting the Long Term FTR Auction: Planning periods 2016 to 2019

Constraint	Type	Control Zone	Severity Ranking by Auction Round		
			1	2	3
Kenney - Stockton	Line	DPL	NA	NA	1
Glenview - Kleeman	Line	DEOK	NA	NA	2
Garner D. P.	Transformer	Dominion	791	706	3
Cornell - Cornell Tap	Line	DEOK	NA	1	5
New Hope - Ocean Pines	Line	DPL	NA	2	22
St. Johns	Transformer	Dominion	NA	NA	4
Erie South - French Road	Line	Penelec	9	5	6
Groveswood - Groveswood Tap	Line	ATSI	NA	NA	7
Montgomery - Rochelle	Line	DEOK	NA	3	NA
Fremont - West Fremont	Line	AEP	16	4	12

Annual FTR Auctions

After the Long Term FTR Auction, residual capability on the PJM transmission system is auctioned in the Annual FTR Auction. Annual FTRs are effective beginning June 1 of the planning period through May 31. Outages expected to last two or more months are included in the determination of the simultaneous feasibility for the Annual FTR Auction. ARR holders who wish to self schedule must inform PJM prior to round one of this auction. Any self-scheduled ARR requests clear

25 percent of the requested volume in each round of the Annual FTR Auction as price takers. This auction consists of four rounds that allow any transmission service customer or PJM members to bid for any FTR or to offer for sale any FTR that they currently hold. FTRs in this auction can be obligations or options for peak, off peak or 24-hour periods. FTRs purchased in one round of the Annual FTR Auction can be sold in later rounds or in the Monthly Balance of Planning Period FTR Auctions.

Table 13-12 shows the top 10 binding constraints for the 2015 to 2016 Annual FTR Auction based on the marginal value of on peak hours.

Table 13-12 Top 10 principal binding transmission constraints limiting the Annual FTR Auction: Planning period 2015 to 2016

Constraint	Type	Control Zone	Severity Ranking by Auction Round			
			1	2	3	4
Bush - Lafayette	Flowgate	MISO	NA	NA	1	NA
Oakgrove - Galesburg	Flowgate	MISO	NA	1	2	2
Kenney - Stockton	Line	DPL	NA	2	3	1
Kenney - Mount Olive	Line	DPL	1	NA	NA	NA
South Akron - Moore Park Tap	Line	ATSI	2	6	75	NA
Wempletown	Transformer	ComEd	3	527	55	4
Bush - Lafayette	Flowgate	MISO	24	3	NA	NA
Lancaster - Maryland	Line	ComEd	4	23	NA	12
Bagley - Raphael Rd.	Line	BGE	6	4	4	3
Hopatcon - Ramapo Tie	Line	PSEG	5	5	5	5

Monthly Balance of Planning Period FTR Auctions

The residual capability of the PJM transmission system, after the Long Term and Annual FTR Auctions are concluded, is offered in the Monthly Balance of Planning Period FTR Auctions. Existing FTRs are modeled as fixed injections and withdrawals. Outages expected to last five or more days are included in the determination of the simultaneous feasibility test for the Monthly Balance of Planning Period FTR Auction. These are single-round monthly auctions that allow any transmission service customer or PJM member to bid for any FTR or to offer for sale any FTR that they currently hold. Market participants can bid for or offer monthly FTRs for any of the next three months remaining in the planning period, or quarterly FTRs for any of the quarters remaining in the planning period. FTRs in the

auctions include obligations and options and 24-hour, on peak and off peak products.²²

Secondary Bilateral Market

Market participants can buy and sell existing FTRs through the PJM administered, bilateral market, or market participants can trade FTRs among themselves without PJM involvement. Bilateral transactions that are not done through PJM can involve parties that are not PJM members. PJM has no knowledge of bilateral transactions that are done outside of PJM’s bilateral market system.

For bilateral trades done through PJM, the FTR transmission path must remain the same, FTR obligations must remain obligations, and FTR options must remain options. However, an individual FTR may be split up into multiple, smaller FTRs, down to increments of 0.1 MW. FTRs can also be given different start and end times, but the start time cannot be earlier than the original FTR start time and the end time cannot be later than the original FTR end time.

Buy Bids

The total FTR buy bids in the Monthly Balance of Planning Period FTR Auctions for the 2014 to 2015 planning period and the first four months of the 2015 to 2016 planning period were 25,346,227 MW and 7,840,917 MW.

Patterns of Ownership

The overall ownership structure of FTRs and the ownership of prevailing flow and counter flow FTRs is descriptive and is not necessarily a measure of actual or potential FTR market structure issues, as the ownership positions result from competitive auctions.

In order to evaluate the ownership of prevailing flow and counter flow FTRs, the MMU categorized all participants owning FTRs in PJM as either physical or financial. Physical entities include utilities and customers which primarily take physical positions in PJM markets. Financial entities include banks and hedge funds which primarily take financial positions in PJM markets. International market participants that primarily take financial positions in PJM markets are

generally considered to be financial entities even if they are utilities in their own countries.

Table 13-13 presents the 2016 to 2019 Long Term FTR Auction market cleared FTRs by trade type, organization type and FTR direction. The results show that financial entities purchased 70.1 percent of prevailing flow buy bid FTRs and 78.5 percent of counter flow buy bid FTRs with the result that financial entities purchased 73.8 percent of all Long Term FTR Auction cleared buy bids for the 2016 to 2019 Long Term FTR Auction.

Table 13-13 Long Term FTR Auction patterns of ownership by FTR direction: Planning periods 2016 to 2019

		FTR Direction		
Trade Type	Organization Type	Prevailing Flow	Counter Flow	All
	Buy Bids	Physical	29.9%	21.5%
Financial		70.1%	78.5%	73.8%
Total		100.0%	100.0%	100.0%
Sell Offers	Physical	29.2%	24.3%	27.5%
	Financial	70.8%	75.7%	72.5%
	Total	100.0%	100.0%	100.0%

Table 13-14 presents the Annual FTR Auction cleared FTRs for the 2015 to 2016 planning period by trade type, organization type and FTR direction. In the Annual FTR Auction for the 2015 to 2016 planning period, financial entities purchased 56.3 percent of prevailing flow FTRs, down 1.2 percent, and 75.0 percent of counter flow FTRs, down 5.0 percent, with the results that financial entities purchased 62.3 percent, down 2.1 percent, of all Annual FTR Auction cleared buy bids for the 2015 to 2016 planning period.

Table 13-14 Annual FTR Auction patterns of ownership by FTR direction: Planning period 2015 to 2016

		FTR Direction			
Trade Type	Organization Type	Self-Scheduled FTRs	Prevailing Flow	Counter Flow	All
		Buy Bids	Physical	Yes	8.8%
No	34.9%			24.1%	31.4%
Total	43.7%			25.0%	37.7%
Financial	Financial	No	56.3%	75.0%	62.3%
		Total	100.0%	100.0%	100.0%
		Sell Offers	Physical	22.9%	23.5%
Financial	Financial	Financial	77.1%	76.5%	76.8%
		Total	100.0%	100.0%	100.0%

Table 13-15 presents the Monthly Balance of Planning Period FTR Auction cleared FTRs for 2015 by trade type, organization type and FTR direction. Financial entities purchased 74.9 percent of prevailing flow FTRs, down

²² See PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014), p. 39.

5.2 percent, and 76.8 percent of counter flow FTRs, down 11.0 percent, for the year, with the result that financial entities purchased 75.7 percent, down 7.3 percent, of all prevailing and counter flow FTR buy bids in the Monthly Balance of Planning Period FTR Auction cleared FTRs for 2015.

Table 13-15 Monthly Balance of Planning Period FTR Auction patterns of ownership by FTR direction: 2015

		FTR Direction		
Trade Type	Organization Type	Prevailing Flow	Counter Flow	All
Buy Bids	Physical	25.1%	23.2%	24.3%
	Financial	74.9%	76.8%	75.7%
	Total	100.0%	100.0%	100.0%
Sell Offers	Physical	33.8%	34.7%	34.1%
	Financial	66.2%	65.3%	65.9%
	Total	100.0%	100.0%	100.0%

Table 13-16 presents the average daily net position ownership for all FTRs for 2015, by FTR direction.

Table 13-16 Daily FTR net position ownership by FTR direction: 2015

		FTR Direction		
Organization Type	Prevailing Flow	Counter Flow	All	
Physical	39.4%	20.4%	32.1%	
Financial	60.6%	79.6%	67.9%	
Total	100.0%	100.0%	100.0%	

Market Performance

Volume

In an effort to address reduced FTR payout ratios, PJM may use normal transmission limits in the FTR auction model. These capability limits may be reduced if ARR funding is not impacted, all requested self-scheduled FTRs clear and net FTR Auction revenue is positive. If the normal capability limit cannot be reached due to infeasibilities then FTR Auction capability reductions are undertaken pro rata based on the MW of Stage 1A infeasibility and the availability of appropriate auction bids for counter flow FTRs.²³

In another effort to reduce FTR funding issues, PJM implemented a new rule stating that PJM may model normal capability limits on facilities which are infeasible due to modeled transmission outages in Monthly Balance of Planning Period FTR Auctions. The capability of these facilities may be reduced if ARR target allocations are fully funded and net auction revenues are greater than

zero. This reduction may only take place when there are counter flow auction bids available to reduce the infeasibilities.²⁴

In the 2016 to 2019 Long Term FTR Auction 120,650 MW (23.2 percent of demand; 43.5 percent of total FTR volume) of counter flow FTR buy bids cleared, an increase from 104,812 MW and 37.7 percent of total FTR volume. In the same auction, prevailing flow FTR buy bids cleared 156,746 MW (8.1 percent of demand; 56.5 percent of total FTR volume) a decrease from 173,054 MW and 62.3 percent of total FTR volume. In the 2016 to 2019 Long Term FTR Auction, there were 22,060 MW (13.5 percent) of counter flow sell offers and 39,151 MW (23.8 percent) of prevailing flow sell offers cleared.

²³ See PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014) p. 56.

²⁴ See PJM, "Manual 6: Financial Transmission Rights," Revision 16 (June 1, 2014) p. 56.

Table 13-17 Long Term FTR Auction market volume: Planning period 2016 to 2019

Trade Type	FTR Direction	Period Type	Bid and		Cleared Volume (MW)	Uncleared		
			Requested Count	Requested Volume (MW)		Cleared Volume	Volume (MW)	Uncleared Volume
Buy bids	Counter Flow	Year 1	69,294	203,576	44,632	21.9%	158,944	78.1%
		Year 2	60,191	167,272	37,036	22.1%	130,236	77.9%
		Year 3	56,893	146,128	37,819	25.9%	108,309	74.1%
		Year All	481	2,849	1,162	40.8%	1,687	59.2%
		Total	186,859	519,826	120,650	23.2%	399,176	76.8%
	Prevailing Flow	Year 1	163,197	708,948	60,879	8.6%	648,069	91.4%
		Year 2	142,419	583,929	47,617	8.2%	536,313	91.8%
		Year 3	144,512	609,599	47,743	7.8%	561,856	92.2%
		Year All	6,237	37,643	507	1.3%	37,135	98.7%
		Total	456,365	1,940,120	156,746	8.1%	1,783,373	91.9%
Total			643,224	2,459,946	277,397	11.3%	2,182,549	88.7%
Sell offers	Counter Flow	Year 1	36,047	101,383	15,139	14.9%	86,243	85.1%
		Year 2	19,076	52,779	6,339	12.0%	46,440	88.0%
		Year 3	4,649	9,646	581	6.0%	9,064	94.0%
		Year All	NA	NA	NA	NA	NA	NA
		Total	59,772	163,807	22,060	13.5%	141,747	86.5%
	Prevailing Flow	Year 1	39,472	102,176	26,278	25.7%	75,898	74.3%
		Year 2	22,689	49,719	11,330	22.8%	38,389	77.2%
		Year 3	6,510	12,278	1,542	12.6%	10,736	87.4%
		Year All	NA	NA	NA	NA	NA	NA
		Total	68,671	164,173	39,151	23.8%	125,022	76.2%
Total			128,443	327,980	61,210	18.7%	266,770	81.3%

Table 13-18 provides the Annual FTR Auction market volume for the 2015 to 2016 planning period. Total FTR buy bids were 2,461,662 MW, down 24.7 percent from 3,270,311 MW for the previous planning period. For the 2015 to 2016 planning period 354,630 MW (14.5 percent) of buy bids cleared, down 3.1 percent from 365,843 MW for the previous planning period. There were 378,744 MW of sell offers with 63,983 MW (16.9 percent) clearing for the 2015 to 2016 planning period. The total volume of cleared buy and self-scheduled bids was 378,328 MW, up 3.4 percent from 365,843 in the previous Annual FTR Auction.

Table 13-18 Annual FTR Auction market volume: Planning period 2015 to 2016

Trade Type	Type	FTR Direction	Bid and Requested Count	Bid and Requested Volume (MW)	Cleared Volume (MW)	Cleared Volume	Uncleared Volume (MW)	Uncleared Volume
Buy bids	Obligations	Counter Flow	98,979	406,755	120,598	29.6%	286,157	70.4%
		Prevailing Flow	321,737	1,650,128	211,385	12.8%	1,438,742	87.2%
		Total	420,716	2,056,883	331,984	16.1%	1,724,899	83.9%
	Options	Counter Flow	86	17,253	21	0.1%	17,231	99.9%
		Prevailing Flow	31,107	363,829	22,625	6.2%	341,204	93.8%
		Total	31,193	381,081	22,646	5.9%	358,435	94.1%
	Total	Counter Flow	99,065	424,007	120,619	28.4%	303,388	71.6%
		Prevailing Flow	352,844	2,013,956	234,011	11.6%	1,779,946	88.4%
	Total	Counter Flow	451,909	2,437,964	354,630	14.5%	2,083,334	85.5%
		Prevailing Flow	352,844	2,013,956	234,011	11.6%	1,779,946	88.4%
Self-scheduled bids	Obligations	Counter Flow	63	1,045	1,045	100.0%	0	0.0%
		Prevailing Flow	2,629	22,654	22,654	100.0%	0	0.0%
		Total	2,692	23,699	23,699	100.0%	0	0.0%
Buy and self-scheduled bids	Obligations	Counter Flow	99,042	407,800	121,643	29.8%	286,157	70.2%
		Prevailing Flow	324,366	1,672,781	234,039	14.0%	1,438,742	86.0%
		Total	423,408	2,080,581	355,682	17.1%	1,724,899	82.9%
	Options	Counter Flow	86	17,253	21	0.1%	17,231	99.9%
		Prevailing Flow	31,107	363,829	22,625	6.2%	341,204	93.8%
		Total	31,193	381,081	22,646	5.9%	358,435	94.1%
	Total	Counter Flow	99,128	425,052	121,664	28.6%	303,388	71.4%
		Prevailing Flow	355,473	2,036,610	256,664	12.6%	1,779,946	87.4%
	Total	Counter Flow	454,601	2,461,662	378,328	15.4%	2,083,334	84.6%
		Prevailing Flow	355,473	2,036,610	256,664	12.6%	1,779,946	87.4%
Sell offers	Obligations	Counter Flow	53,483	162,830	23,986	14.7%	138,844	85.3%
		Prevailing Flow	70,454	205,920	39,619	19.2%	166,301	80.8%
		Total	123,937	368,750	63,605	17.2%	305,144	82.8%
	Options	Counter Flow	2	15	0	0.0%	15	100.0%
		Prevailing Flow	3,462	9,979	378	3.8%	9,601	96.2%
		Total	3,464	9,994	378	3.8%	9,616	96.2%
	Total	Counter Flow	53,485	162,845	23,986	14.7%	138,859	85.3%
		Prevailing Flow	73,916	215,899	39,997	18.5%	175,902	81.5%
	Total	Counter Flow	127,401	378,744	63,983	16.9%	314,761	83.1%
		Prevailing Flow	73,916	215,899	39,997	18.5%	175,902	81.5%

Figure 13-6 shows the bid volumes of the Annual FTR Auctions from the 2009 to 2010 planning period through the 2015 to 2016 planning period and the associated planning period payout ratios, represented by the background bars. The payout ratio for the current planning period is shown as dotted background because it is not yet final. Bid volume has not changed significantly with payout ratio, with the exception of on and off peak prevailing flow products. For on and off peak prevailing flow products, the 2012 to 2013 planning period the bid volume decreased 24.3 percent from the 2011 to 2012 planning period, but then increased 30.5 percent for the 2013 to 2014 planning period despite an only slightly improved payout ratio.

Figure 13-6 Annual Bid FTR Auction volume: Planning period 2009 to 2010 through 2015 to 2016

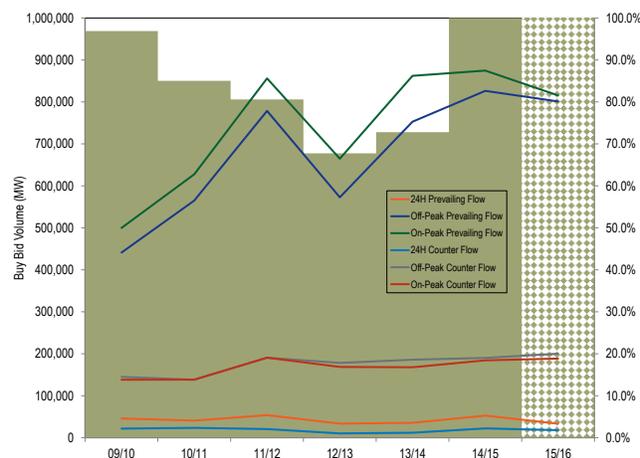


Figure 13-7 shows the cleared volumes of the Annual FTR Auctions from planning period 2009 to 2010 through the 2015 to 2016 planning period and the associated planning period payout ratios, represented by the background bars. The payout ratio for the current planning period is shown as dotted background because it is not yet final. The cleared MW increased from the 2009 to 2010 planning period through the 2013 to the 2014 planning period, as a market response to lower payout ratios compared to target allocations. The 2014 to 2015 planning period volume was 19.1 percent lower than the 2013 to 2014 planning period, while the 2015 to 2016 planning period was 16.3 percent lower than the 2013 to 2014 volume, as a result of PJM's more restrictive modeling of Stage 1B and Stage 2 ARR, leading to fewer available FTRs in the Annual FTR Auction and higher prices.

Figure 13-7 Annual Cleared FTR Auction volume: Planning period 2009 to 2010 through 2015 to 2016

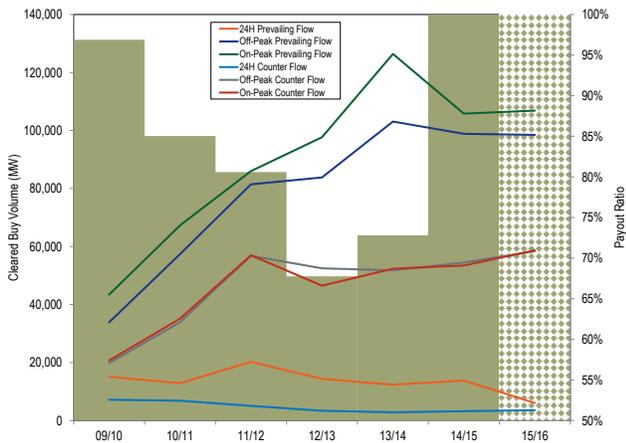


Table 13-19 shows the proportion of ARRs self-scheduled as FTRs for the last six planning periods. The maximum possible level of self-scheduled FTRs includes all ARRs, including RTEP ARRs. Eligible participants self-scheduled 23,699 MW (30.4 percent) of ARRs as FTRs for the 2015 to 2016 planning period, down from 26,964 MW (36.7 percent) in the previous planning period. This reduction was a market response to the relative values of ARRs and FTRs.

Table 13-19 Comparison of self-scheduled FTRs: Planning periods 2009 to 2010 through 2015 to 2016

Planning Period	Self-Scheduled FTRs (MW)	Maximum Possible Self-Scheduled FTRs (MW)	Percent of ARRs Self-Scheduled as FTRs
2009/2010	68,589	109,613	62.6%
2010/2011	55,669	102,046	54.6%
2011/2012	46,017	103,660	44.4%
2012/2013	41,351	99,115	41.7%
2013/2014	29,289	94,097	31.1%
2014/2015	26,964	73,504	36.7%
2015/2016	23,699	77,872	30.4%

Table 13-20 provides the Monthly Balance of Planning Period FTR Auction market volume for the entire 2014 to 2015 planning period and the first seven months of the 2015 to 2016 planning period. There were 13,392,911 MW of FTR obligation buy bids and 3,163,460 MW of FTR obligation sell offers for all bidding periods in the first seven months of the 2015 to 2016 planning period. The monthly balance of planning period auction cleared 1,408,108 MW (10.5 percent) of FTR obligation buy bids and 714,041 MW (22.6 percent) of FTR obligation sell offers.

There were 2,420,615 MW of FTR option buy bids and 332,014 MW of FTR option sell offers for all bidding periods in the Monthly Balance of Planning Period FTR Auctions for the first seven months of the 2015 to 2016 planning period. The monthly auctions cleared 58,877 (2.4 percent) of FTR option buy bids, and 89,422 MW (26.9 percent) of FTR option sell offers.

Table 13-20 Monthly Balance of Planning Period FTR Auction market volume: 2015

Monthly Auction	Type	Trade Type	Bid and Requested Count	Bid and Requested Volume (MW)	Cleared Volume (MW)	Cleared Volume %	Uncleared Volume (MW)	Uncleared Volume %
Jan-15	Obligations	Buy bids	252,024	1,586,427	144,179	9.1%	1,442,248	90.9%
		Sell offers	99,255	247,626	61,026	24.6%	186,600	75.4%
	Options	Buy bids	10,732	263,464	2,787	1.1%	260,678	98.9%
		Sell offers	2,886	15,735	4,571	29.1%	11,164	70.9%
Feb-15	Obligations	Buy bids	266,009	1,417,759	161,646	11.4%	1,256,112	88.6%
		Sell offers	96,236	237,844	51,752	21.8%	186,091	78.2%
	Options	Buy bids	12,280	284,062	6,106	2.1%	277,956	97.9%
		Sell offers	3,281	16,999	5,332	31.4%	11,667	68.6%
Mar-15	Obligations	Buy bids	254,361	1,467,192	151,571	10.3%	1,315,621	89.7%
		Sell offers	97,054	259,360	54,239	20.9%	205,121	79.1%
	Options	Buy bids	7,894	216,952	8,671	4.0%	208,281	96.0%
		Sell offers	4,158	28,822	8,783	30.5%	20,039	69.5%
Apr-15	Obligations	Buy bids	195,242	1,239,939	133,675	10.8%	1,106,263	89.2%
		Sell offers	67,401	211,198	53,998	25.6%	157,200	74.4%
	Options	Buy bids	6,529	189,448	6,364	3.4%	183,084	96.6%
		Sell offers	3,049	23,932	7,442	31.1%	16,490	68.9%
May-15	Obligations	Buy bids	118,504	696,460	81,864	11.8%	614,596	88.2%
		Sell offers	35,828	104,822	36,911	35.2%	67,910	64.8%
	Options	Buy bids	3,709	120,692	2,524	2.1%	118,169	97.9%
		Sell offers	1,366	12,379	4,778	38.6%	7,600	61.4%
Jun-15	Obligations	Buy bids	384,766	2,017,412	187,357	9.3%	1,830,054	90.7%
		Sell offers	180,141	553,702	102,726	18.6%	450,976	81.4%
	Options	Buy bids	12,429	352,799	7,999	2.3%	344,800	97.7%
		Sell offers	11,041	57,100	15,172	26.6%	41,928	73.4%
Jul-15	Obligations	Buy bids	427,398	1,909,109	208,278	10.9%	1,700,831	89.1%
		Sell offers	185,213	575,921	111,179	19.3%	464,742	80.7%
	Options	Buy bids	16,004	432,537	9,019	2.1%	423,517	97.9%
		Sell offers	14,202	52,274	15,790	30.2%	36,483	69.8%
Aug-15	Obligations	Buy bids	379,565	1,624,183	174,941	10.8%	1,449,242	89.2%
		Sell offers	147,217	405,601	92,842	22.9%	312,759	77.1%
	Options	Buy bids	14,473	421,949	8,971	2.1%	412,978	97.9%
		Sell offers	12,307	46,856	12,875	27.5%	33,981	72.5%
Sep-15	Obligations	Buy bids	416,971	2,241,148	249,881	11.1%	1,991,267	88.9%
		Sell offers	146,522	420,845	86,461	20.5%	334,385	79.5%
	Options	Buy bids	12,489	387,724	9,252	2.4%	378,472	97.6%
		Sell offers	11,516	48,013	12,315	25.6%	35,698	74.4%
Oct-15	Obligations	Buy bids	333,888	1,416,533	179,387	12.7%	1,237,146	87.3%
		Sell offers	160,065	465,514	104,934	22.5%	360,581	77.5%
	Options	Buy bids	13,032	287,985	7,718	2.7%	280,267	97.3%
		Sell offers	9,167	42,569	10,572	24.8%	31,997	75.2%
Nov-15	Obligations	Buy bids	388,822	2,208,150	207,167	9.4%	2,000,983	90.6%
		Sell offers	147,105	382,018	111,712	29.2%	270,306	70.8%
	Options	Buy bids	13,314	274,669	7,677	2.8%	266,992	97.2%
		Sell offers	8,310	40,607	10,822	26.7%	29,785	73.3%
Dec-15	Obligations	Buy bids	368,842	1,976,377	201,097	10.2%	1,775,280	89.8%
		Sell offers	146,219	359,859	104,188	29.0%	255,671	71.0%
	Options	Buy bids	10,814	262,952	8,240	3.1%	254,711	96.9%
		Sell offers	9,662	44,596	11,876	26.6%	32,720	73.4%
2014/2015*	Obligations	Buy bids	333,888	21,777,160	179,387	0.8%	21,597,773	99.2%
		Sell offers	160,065	3,357,375	104,934	3.1%	3,252,441	96.9%
	Options	Buy bids	13,032	3,569,067	7,718	0.2%	3,561,348	99.8%
		Sell offers	9,167	225,710	10,572	4.7%	215,138	95.3%
2015/2016**	Obligations	Buy bids	2,700,252	13,392,911	1,408,108	10.5%	11,984,803	89.5%
		Sell offers	1,112,482	3,163,460	714,041	22.6%	2,449,419	77.4%
	Options	Buy bids	92,555	2,420,615	58,877	2.4%	2,361,738	97.6%
		Sell offers	76,205	332,014	89,422	26.9%	242,593	73.1%

* Shows twelve months for 2014/2015; ** Shows seven months ended December 31 for 2015/2016

Table 13-21 presents the buy-bid, bid and cleared volume of the Monthly Balance of Planning Period FTR Auction, and the effective periods for the volume. The average monthly cleared volume for 2015 was 180,531.0 MW. The average monthly cleared volume for 2014 was 224,036.6 MW.

Table 13-21 Monthly Balance of Planning Period FTR Auction buy-bid, bid and cleared volume (MW per period): 2015

Monthly Auction	MW Type	Prompt Month	Second Month	Third Month	Q1	Q2	Q3	Q4	Total
Jan-15	Bid	971,818	380,246	165,248				332,579	1,849,891
	Cleared	90,259	25,220	7,982				23,505	146,966
Feb-15	Bid	930,310	230,137	204,195				337,179	1,701,821
	Cleared	103,322	16,683	14,472				33,276	167,753
Mar-15	Bid	926,146	248,594	275,292				234,112	1,684,143
	Cleared	105,252	23,524	20,266				11,200	160,242
Apr-15	Bid	1,039,343	390,043						1,429,386
	Cleared	113,418	26,621						140,039
May-15	Bid	817,152							817,152
	Cleared	84,387							84,387
Jun-15	Bid	766,478	314,523	305,243	128,762	286,539	295,518	273,146	2,370,211
	Cleared	81,472	22,796	20,096	8,887	22,091	23,222	16,792	195,356
Jul-15	Bid	904,856	349,043	208,322		291,464	304,176	283,784	2,341,645
	Cleared	94,500	29,493	14,536		26,019	28,501	24,249	217,298
Aug-15	Bid	691,897	309,793	197,303		253,731	304,429	288,979	2,046,131
	Cleared	80,734	22,612	16,510		16,943	25,396	21,717	183,912
Sep-15	Bid	1,153,687	364,094	306,346		138,961	343,682	322,103	2,628,872
	Cleared	132,952	37,968	24,533		11,011	23,214	29,455	259,133
Oct-15	Bid	672,814	306,427	221,964			261,395	241,919	1,704,518
	Cleared	94,781	30,910	13,282			23,195	24,938	187,105
Nov-15	Bid	1,343,152	329,830	307,998			205,138	296,701	2,482,819
	Cleared	108,573	32,856	26,531			14,028	32,857	214,844
Dec-15	Bid	1,241,897	307,725	249,625			138,292	301,790	2,239,329
	Cleared	124,375	26,497	17,112			10,766	30,587	209,337

Figure 13-8 Cleared auction volume (MW) as a percent of total FTR cleared volume by calendar month: June 2004 through December 2015

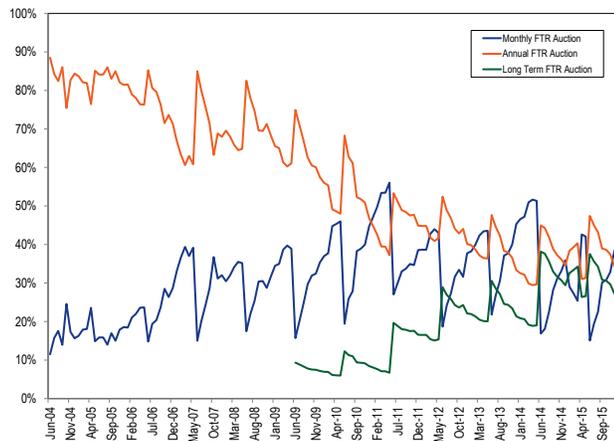


Figure 13-8 shows cleared auction volumes as a percent of the total FTR cleared volume by calendar months for June 2004 through December 2015, by type of auction. FTR volumes are included in the calendar month they are effective, with Long Term and Annual FTR auction volume spread equally to each month in the relevant planning period. This figure shows the share of FTRs purchased in each auction type by month. Over the course of the planning period an increasing number of Monthly Balance of Planning Period FTRs are purchased, making them a greater portion of active FTRs. When the Annual FTR Auction occurs, FTRs purchased in any previous Monthly Balance of Planning Period Auction, other than the current June auction, are no longer in effect, so there is a reduction in their share of total FTRs with an accompanying rise in the share of Annual FTRs.

Table 13-22 provides the secondary bilateral FTR market volume for the entire 2014 to 2015 and 2015 to 2016 planning periods.

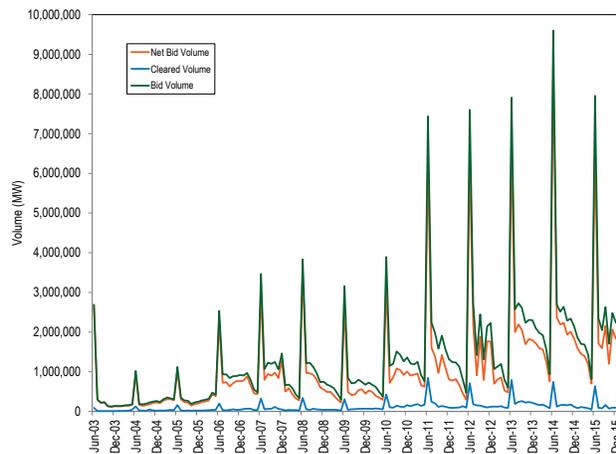
Table 13-22 Secondary bilateral FTR market volume: Planning periods 2014 to 2015 and 2015 to 2016²⁵

Planning Period	Type	Class Type	Volume (MW)
2014/2015	Obligation	24-Hour	203
		On Peak	1,535
		Off Peak	1,141
		Total	2,879
	Option	24-Hour	0
		On Peak	0
Off Peak		0	
	Total	0	
2015/2016	Obligation	24-Hour	636
		On Peak	20,338
		Off Peak	17,842
		Total	38,816
	Option	24-Hour	0
		On Peak	2,523
Off Peak		2,169	
	Total	4,691	

²⁵ The 2013 to 2014 planning period covers bilateral FTRs that are effective for any time between June 1, 2013 through June 1, 2014, which originally had been purchased in a Long Term FTR Auction, Annual FTR Auction or Monthly Balance of Planning Period FTR Auction.

Figure 13-9 shows the FTR bid, cleared and net bid volume from June 2003 through December 2015 for Long Term, Annual and Monthly Balance of Planning Period Auctions.²⁶ Cleared volume is the volume of FTR buy and sell offers that were accepted. The net bid volume includes the total buy, sell and self-scheduled offers, counting sell offers as a negative volume. The bid volume is the total of all bid and self-scheduled offers, excluding sell offers. Bid volumes and net bid volumes have increased since 2003. Cleared volume was relatively steady until 2010, with an increase in 2011 followed by a slight decrease in 2012. In 2013, cleared volume increased, and there was a larger increase in 2014. The demand for FTRs has increased.

Figure 13-9 Long Term, Annual and Monthly FTR Auction bid and cleared volume: June 2003 through December 2015



Price

Table 13-23 shows the cleared, weighted-average prices by trade type, FTR direction, period type and class type for the 2016 to 2019 Long Term FTR Auction. Only FTR obligation products are available in the Long Term FTR Auctions. In this auction, weighted-average buy bid counter flow and prevailing flow FTR prices were $-\$0.36$ and $\$0.28$, compared to $-\$0.23$ and $\$0.21$ from the 2014 to 2017 Long Term FTR Auction. Weighted-average sell bid counter flow and prevailing flow FTR prices were $-\$0.33$ and $\$0.45$, compared to $-\$0.42$ for counter flow FTRs and up from $\$0.27$ for prevailing flow FTRs.

²⁶ The data for this table are available in 2014 State of the Market Report for PJM, Volume 2, Appendix H.

Table 13-23 Long Term FTR Auction weighted-average cleared prices (Dollars per MW): Planning periods 2016 to 2019

Trade Type	FTR Direction	Period Type	Class Type			
			24-Hour	On Peak	Off Peak	All
Buy bids	Counter Flow	Year 1	(\$1.02)	(\$0.40)	(\$0.59)	(\$0.53)
		Year 2	(\$0.76)	(\$0.39)	(\$0.58)	(\$0.50)
		Year 3	(\$0.45)	(\$0.31)	(\$0.51)	(\$0.40)
		Year All	NA	(\$0.05)	(\$0.11)	(\$0.07)
		Total	(\$0.80)	(\$0.36)	(\$0.55)	(\$0.47)
	Prevailing Flow	Year 1	\$0.64	\$0.44	\$0.63	\$0.54
		Year 2	\$0.59	\$0.37	\$0.56	\$0.46
		Year 3	\$0.52	\$0.27	\$0.43	\$0.35
		Year All	NA	\$0.00	\$0.30	\$0.13
		Total	\$0.56	\$0.36	\$0.55	\$0.45
Sell offers	Counter Flow	Year 1	(\$1.57)	(\$0.32)	(\$0.51)	(\$0.41)
		Year 2	NA	(\$0.23)	(\$0.38)	(\$0.30)
		Year 3	NA	(\$0.16)	(\$0.29)	(\$0.21)
		Year All	NA	NA	NA	NA
		Total	(\$1.55)	(\$0.29)	(\$0.47)	(\$0.37)
	Prevailing Flow	Year 1	\$1.02	\$0.36	\$0.58	\$0.46
		Year 2	\$1.14	\$0.25	\$0.48	\$0.35
		Year 3	NA	\$0.26	\$0.53	\$0.38
		Year All	NA	NA	NA	NA
		Total	\$1.04	\$0.32	\$0.55	\$0.43
Total			(\$0.04)	\$0.10	\$0.19	\$0.14

Figure 13-10 shows the volume-weighted average buy bid price for the Annual FTR Auctions from the 2009 to 2010 through the 2015 to 2016 planning periods and the associated planning period payout ratios, represented by the background bars. The payout ratio for the 2015 to 2016 planning period is shown as dotted background because it is not yet final. From the 2010 to 2011 planning period to the 2013 to 2014 planning period FTR prices decreased. The 2014 to 2015 and 2015 to 2016 planning periods 24 hour obligation prices increased 142.5 percent and 210.8 percent. This large price increase was driven by the significant decrease in FTR supply volume during the Annual FTR Auction which was a result of PJM's decisions to use a more constrained model and its impact on Stage 1B and Stage 2 ARR allocations. The increased price due to decreased volume has led to an increase in ARR target allocations for the planning period.

Figure 13-10 Annual FTR Auction volume-weighted average buy bid price: Planning period 2009 to 2010 through 2015 to 2016

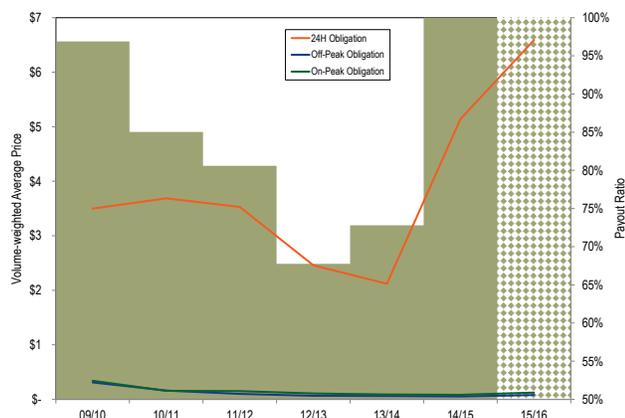


Table 13-24 shows the weighted-average cleared buy-bid prices by trade type, FTR product, FTR direction and class type for the Annual FTR Auction for the 2015 to 2016 planning period. The weighted-average cleared buy bid price in the 2015 to 2016 Annual FTR Auction was \$0.31 per MW, up from \$0.29 per MW in the 2014 to 2015 planning period.

Table 13-24 Annual FTR Auction weighted-average cleared prices (Dollars per MW): Planning period 2015 to 2016

Trade Type	Type	FTR Direction	Class Type			All	
			24-Hour	On Peak	Off Peak		
Buy bids	Obligations	Counter Flow	(\$0.74)	(\$0.48)	(\$0.30)	(\$0.40)	
		Prevailing Flow	\$1.33	\$1.00	\$0.62	\$0.83	
		Total	\$0.57	\$0.47	\$0.28	\$0.39	
	Options	Counter Flow	\$0.00	\$0.00	\$0.00	\$0.00	
		Prevailing Flow	\$3.01	\$0.50	\$0.32	\$0.43	
		Total	\$3.01	\$0.50	\$0.32	\$0.43	
Self-scheduled bids	Obligations	Counter Flow	(\$0.09)	NA	NA	(\$0.09)	
		Prevailing Flow	\$1.65	NA	NA	\$1.65	
		Total	\$1.58	NA	NA	\$1.58	
Buy and self-scheduled bids	Obligations	Counter Flow	(\$0.59)	(\$0.48)	(\$0.30)	(\$0.40)	
		Prevailing Flow	\$1.59	\$1.00	\$0.62	\$0.98	
		Total	\$1.29	\$0.47	\$0.28	\$0.53	
	Options	Counter Flow	\$0.00	\$0.00	\$0.00	\$0.00	
		Prevailing Flow	\$3.01	\$0.50	\$0.32	\$0.43	
		Total	\$3.01	\$0.50	\$0.32	\$0.43	
	Sell offers	Obligations	Counter Flow	(\$2.00)	(\$0.58)	(\$0.50)	(\$0.60)
			Prevailing Flow	\$0.69	\$0.50	\$0.33	\$0.42
			Total	(\$0.85)	\$0.12	\$0.02	\$0.04
Options		Counter Flow	NA	NA	NA	NA	
		Prevailing Flow	\$0.00	\$0.33	\$0.12	\$0.18	
		Total	\$0.00	\$0.33	\$0.12	\$0.18	

Table 13-25 shows the weighted-average cleared buy-bid price in the Monthly Balance of Planning Period FTR Auctions by bidding period for January 2015 through December 2015. For example, for the January 2015 Monthly Balance of Planning Period FTR Auction, the current month column is January, the second month column is February and the third month column is March. Quarters 1 through 4 are represented in the Q1, Q2, Q3 and Q4 columns. The total column represents all of the activity within the January 2015 Monthly Balance of Planning Period FTR Auction.

The cleared weighted-average price paid in the Monthly Balance of Planning Period FTR Auctions for January through December 2015 was \$0.24 per MW, up from \$0.16 per MW in the same time last year, a 50.0 percent increase in FTR prices. The cleared weighted-average price for the current planning period was \$0.25, up 56.2 percent from \$0.16 for the same time period during the previous planning period.

Table 13-25 Monthly Balance of Planning Period FTR Auction cleared, weighted-average, buy-bid price per period (Dollars per MW): January through December 2015

Monthly Auction	Prompt Month	Second Month	Third Month	FTR Direction				Total
				Q1	Q2	Q3	Q4	
Jan-15	\$0.38	\$0.57	\$0.16				\$0.19	\$0.33
Feb-15	\$0.21	\$0.30	\$0.21				\$0.11	\$0.17
Mar-15	\$0.27	\$0.27	\$0.20				\$0.13	\$0.24
Apr-15	\$0.17	\$0.20					\$0.00	\$0.18
May-15	\$0.20						\$0.00	\$0.20
Jun-15	\$0.25	\$0.38	\$0.32	\$0.29	\$0.27	\$0.63	\$0.34	\$0.36
Jul-15	\$0.25	\$0.33	\$0.02		\$0.31	\$0.39	\$0.20	\$0.28
Aug-15	\$0.21	\$0.21	\$0.24		\$0.06	\$0.47	\$0.24	\$0.26
Sep-15	\$0.08	\$0.13	\$0.08		\$0.32	\$0.42	\$0.15	\$0.18
Oct-15	\$0.19	\$0.20	(\$0.05)			\$0.47	\$0.16	\$0.24
Nov-15	\$0.17	\$0.20	\$0.34			\$0.39	\$0.17	\$0.21
Dec-15	\$0.16	\$0.23	\$0.33			\$0.23	\$0.16	\$0.18

Profitability

FTR profitability is the difference between the revenue received for an FTR and the cost of the FTR. For a prevailing flow FTR, the FTR credits are the actual revenue that an FTR holder receives and the auction price is the cost. For a counter flow FTR, the auction price is the revenue that an FTR holder is paid and the FTR credits are the cost to the FTR holder, which the FTR holder must pay. The cost of self-scheduled FTRs is zero. ARR holders that self schedule FTRs purchase the FTRs in the Annual FTR Auction, but the ARR holders receive offsetting ARR credits that equal the purchase price of the FTRs.

The fact that FTRs have been consistently profitable regardless of the payout ratio raises questions about the design of the process. If FTRs are profitable why do participants not bid FTR prices up to the point where profits approach zero?

Table 13-26 FTR profits by organization type and FTR direction: 2015

Organization Type	FTR Direction				All
	Prevailing Flow	Self Scheduled Prevailing Flow	Counter Flow	Self Scheduled Counter Flow	
Physical	\$153,200,377	\$324,887,334	(\$25,582,647)	\$1,042,334	\$453,547,398
Financial	\$147,619,734	NA	\$34,662,401	NA	\$182,282,134
Total	\$300,820,110	\$324,887,334	\$9,079,754	\$1,042,334	\$635,829,532

Table 13-26 lists FTR profits by organization type and FTR direction for the period from January through December 2015. FTR profits are the sum of the daily FTR credits, including for self-scheduled FTRs, minus the daily FTR auction costs for each FTR held by an

organization. The FTR target allocation is equal to the product of the FTR MW and congestion price differences between sink and source in the Day-Ahead Energy Market. The FTR credits do not include after the fact adjustments which are very small and do not occur in every month. The daily FTR auction costs are the product of the FTR MW and the auction price divided by the time period of the FTR in days. Self-scheduled FTRs have zero cost. FTRs were profitable overall, with \$453.5 million in profits for physical entities, of which \$325.9 million was from self-scheduled FTRs, and \$182.3 million for financial entities. Counter flow FTR profits for financial participants increased greatly in the fourth quarter, from \$1.3 million at the end of the September to \$34.7 million at the end December. In 2014, FTRs were more profitable, with an overall profit of \$1,417.6 million. The large profit last year was mainly due to January 2014, which experienced unusually high congestion.

Table 13-27 lists the monthly FTR profits in 2015 by organization type.

Table 13-27 Monthly FTR profits by organization type: 2015

Month	Organization Type			Total
	Physical	Physical FTRs	Financial	
Jan	\$12,061,474	\$34,995,565	\$31,637,412	\$78,694,451
Feb	\$76,959,226	\$97,372,186	\$103,812,757	\$278,144,168
Mar	\$5,881,768	\$27,967,818	\$35,574,450	\$69,424,036
Apr	(\$6,468,547)	\$16,657,504	\$8,362,429	\$18,551,386
May	\$17,605,952	\$29,353,275	\$8,298,743	\$55,257,970
Jun	\$4,217,724	\$22,731,406	\$3,265,064	\$30,214,195
Jul	(\$1,273,858)	\$16,657,006	(\$3,054,368)	\$12,328,779
Aug	(\$7,223,862)	\$12,479,243	(\$12,355,914)	(\$7,100,534)
Sep	\$8,763,025	\$16,495,114	(\$1,942,823)	\$23,315,316
Oct	\$11,147,268	\$18,948,791	(\$3,208,916)	\$26,887,143
Nov	\$18,125,472	\$20,090,351	\$926,228	\$39,142,051
Dec	(\$10,999,614)	\$12,175,007	\$9,803,392	\$10,978,784
Total	\$128,796,027	\$325,923,265	\$181,118,455	\$635,837,747

Revenue

Long Term FTR Auction Revenue

Table 13-28 shows the Long Term FTR Auction revenue data by trade type, FTR direction, period type and class type. The 2016 to 2019 Long Term FTR Auction netted \$23.2 million in revenue, \$6.4 million more than the previous Long Term FTR Auction. Buyers paid \$60.4 million and sellers received \$37.1 million, up \$33.2 million and \$26.7 million over the previous Long Term FTR Auction. In general, revenue increased substantially over the previous Long Term FTR Auction, with counter flow buy bid revenue increasing 198.7 percent and prevailing flow buy bid revenue increasing 169.8 percent.

Table 13-28 Long Term FTR Auction Revenue: Planning periods 2016 to 2019

		Class Type				
Trade Type	FTR Direction	Period Type	24-Hour	On Peak	Off Peak	All
Buy bids	Counter Flow	Year 1	(\$17,524,187)	(\$51,369,274)	(\$40,309,389)	(\$109,202,849)
		Year 2	(\$8,298,786)	(\$42,364,684)	(\$32,890,794)	(\$83,554,264)
		Year 3	(\$3,506,308)	(\$35,282,333)	(\$29,002,985)	(\$67,791,626)
		Year All	(\$2)	(\$624,031)	(\$478,803)	(\$1,102,835)
		Total	(\$29,329,283)	(\$129,640,322)	(\$102,681,970)	(\$261,651,575)
	Prevailing Flow	Year 1	\$8,227,038	\$77,647,069	\$60,254,171	\$146,128,278
		Year 2	\$7,639,963	\$52,624,403	\$39,843,317	\$100,107,683
		Year 3	\$6,187,338	\$38,876,904	\$29,771,775	\$74,836,017
		Year All	\$57,704	\$877,122	\$12,452	\$947,278
		Total	\$22,112,044	\$170,025,498	\$129,881,715	\$322,019,256
Total			(\$7,217,239)	\$40,385,176	\$27,199,744	\$60,367,681
Sell offers	Counter Flow	Year 1	(\$521,181)	(\$14,981,202)	(\$11,736,474)	(\$27,238,857)
		Year 2	(\$85)	(\$4,755,532)	(\$3,573,202)	(\$8,328,818)
		Year 3	0	(\$305,404)	(\$238,399)	(\$543,803)
		Year All	NA	NA	NA	NA
		Total	(\$521,266)	(\$20,042,138)	(\$15,548,074)	(\$36,111,478)
	Prevailing Flow	Year 1	\$406,667	\$30,277,463	\$22,341,053	\$53,025,184
		Year 2	\$81,595	\$10,556,020	\$6,982,324	\$17,619,939
		Year 3	0	\$1,630,664	\$961,927	\$2,592,591
		Year All	NA	NA	NA	NA
		Total	\$488,262	\$42,464,148	\$30,285,304	\$73,237,714
Total			(\$33,004)	\$22,422,010	\$14,737,230	\$37,126,236
Total			(\$7,184,236)	\$17,963,167	\$12,462,515	\$23,241,446

Annual FTR Auction Revenue

Table 13-29 shows the Annual FTR Auction revenue by trade type, type, FTR direction and class type. The Annual FTR Auction for the 2015 to 2016 planning period generated \$936.3 million, up 25.1 percent from \$748.6 million in the 2014 to 2015 planning period, and up 67.7 percent from \$558.4 in the 2013 to 2014 planning period. Counter flow FTR holders received \$157.1 million, up 10.5 percent from the previous planning period and prevailing flow FTR holders paid \$1,093.4 million, up 22.7 percent from the previous planning period.

Table 13-29 Annual FTR Auction revenue: Planning period 2015 to 2016

Trade Type	Type	FTR Direction	Class Type				
			24-Hour	On Peak	Off Peak	All	
Buy bids	Obligations	Counter Flow	(\$22,998,708)	(\$115,833,322)	(\$79,872,792)	(\$218,704,822)	
		Prevailing Flow	\$70,921,369	\$440,928,707	\$283,846,269	\$795,696,345	
		Total	\$47,922,661	\$325,095,385	\$203,973,477	\$576,991,523	
	Options	Counter Flow	\$0	\$0	\$0	\$0	
		Prevailing Flow	\$3,412,228	\$23,054,249	\$17,051,001	\$43,517,479	
		Total	\$3,412,228	\$23,054,249	\$17,051,001	\$43,517,479	
	Total	Counter Flow	(\$22,998,708)	(\$115,833,322)	(\$79,872,792)	(\$218,704,822)	
		Prevailing Flow	\$74,333,597	\$463,982,956	\$300,897,271	\$839,213,824	
		Total	\$51,334,889	\$348,149,634	\$221,024,478	\$620,509,002	
Self-scheduled bids	Obligations	Counter Flow	(\$803,134)	NA	NA	(\$803,134)	
		Prevailing Flow	\$328,924,705	NA	NA	\$328,924,705	
		Total	\$328,121,572	NA	NA	\$328,121,572	
Buy and self-scheduled bids	Obligations	Counter Flow	(\$23,801,841)	(\$115,833,322)	(\$79,872,792)	(\$219,507,955)	
		Prevailing Flow	\$399,846,074	\$440,928,707	\$283,846,269	\$1,124,621,050	
		Total	\$376,044,233	\$325,095,385	\$203,973,477	\$905,113,095	
	Options	Counter Flow	\$0	\$0	\$0	\$0	
		Prevailing Flow	\$3,412,228	\$23,054,249	\$17,051,001	\$43,517,479	
		Total	\$3,412,228	\$23,054,249	\$17,051,001	\$43,517,479	
	Total	Counter Flow	(\$23,801,841)	(\$115,833,322)	(\$79,872,792)	(\$219,507,955)	
		Prevailing Flow	\$403,258,302	\$463,982,956	\$300,897,271	\$1,168,138,529	
		Total	\$379,456,461	\$348,149,634	\$221,024,478	\$948,630,574	
	Sell offers	Obligations	Counter Flow	(\$8,864,388)	(\$26,951,089)	(\$26,599,078)	(\$62,414,555)
			Prevailing Flow	\$2,292,837	\$42,440,354	\$29,751,044	\$74,484,235
			Total	(\$6,571,551)	\$15,489,266	\$3,151,965	\$12,069,680
Options		Counter Flow	\$0	\$0	\$0	\$0	
		Prevailing Flow	\$0	\$141,030	\$158,316	\$299,346	
		Total	\$0	\$141,030	\$158,316	\$299,346	
Total		Counter Flow	(\$8,864,388)	(\$26,951,089)	(\$26,599,078)	(\$62,414,555)	
		Prevailing Flow	\$2,292,837	\$42,581,384	\$29,909,360	\$74,783,581	
		Total	(\$6,571,551)	\$15,630,295	\$3,310,282	\$12,369,026	
Total		\$386,028,012	\$332,519,339	\$217,714,197	\$936,261,548		

Monthly Balance of Planning Period FTR Auction Revenue

Table 13-30 shows Monthly Balance of Planning Period FTR Auction revenue by trade type, type and class type for January through December 2015. The Monthly Balance of Planning Period FTR Auctions for the 2015 to 2016 planning period netted \$25.8 million in revenue, with buyers paying \$209.4 million and sellers receiving \$183.7 million for the first seven months of the 2015 to 2016 planning period. For the entire 2014 to 2015 planning period, the Monthly Balance of Planning Period FTR Auctions netted \$19.3 million in revenue with buyers paying \$214.3 million and sellers receiving \$195.0 million.

Table 13-30 Monthly Balance of Planning Period FTR Auction revenue: 2015

Monthly Auction	Type	Trade Type	Class Type			
			24-Hour	On Peak	Off Peak	All
Jan-15	Obligations	Buy bids	(\$618,302)	\$13,581,853	\$10,015,068	\$22,978,619
		Sell offers	\$635,745	\$10,914,326	\$7,928,853	\$19,478,925
	Options	Buy bids	\$0	\$256,008	\$168,789	\$424,797
		Sell offers	\$8,592	\$1,047,368	\$1,259,073	\$2,315,033
Feb-15	Obligations	Buy bids	(\$147,453)	\$7,611,995	\$6,052,270	\$13,516,812
		Sell offers	\$114,483	\$5,945,620	\$4,885,777	\$10,945,879
	Options	Buy bids	\$5,211	\$498,896	\$432,335	\$936,443
		Sell offers	\$26	\$1,332,728	\$1,345,070	\$2,677,824
Mar-15	Obligations	Buy bids	\$47,778	\$8,735,038	\$6,313,585	\$15,096,401
		Sell offers	\$1,543	\$6,293,269	\$4,485,916	\$10,780,728
	Options	Buy bids	\$0	\$408,180	\$399,129	\$807,309
		Sell offers	\$23	\$1,419,352	\$1,351,464	\$2,770,839
Apr-15	Obligations	Buy bids	(\$285,836)	\$5,243,669	\$3,185,097	\$8,142,930
		Sell offers	\$131,098	\$3,852,576	\$2,136,076	\$6,119,750
	Options	Buy bids	\$8,726	\$560,959	\$381,773	\$951,458
		Sell offers	\$17	\$1,062,303	\$934,036	\$1,996,356
May-15	Obligations	Buy bids	(\$1,534,332)	\$4,116,947	\$3,375,795	\$5,958,410
		Sell offers	(\$67,511)	\$2,225,577	\$1,600,569	\$3,758,635
	Options	Buy bids	\$0	\$224,867	\$72,334	\$297,201
		Sell offers	\$23	\$777,796	\$694,570	\$1,472,389
Jun-15	Obligations	Buy bids	\$974,245	\$25,819,492	\$15,835,242	\$42,628,980
		Sell offers	\$852,490	\$18,479,372	\$12,329,257	\$31,661,119
	Options	Buy bids	\$0	\$1,400,901	\$849,366	\$2,250,267
		Sell offers	\$7,166	\$4,818,452	\$3,094,994	\$7,920,611
Jul-15	Obligations	Buy bids	\$1,633,632	\$22,311,865	\$12,897,614	\$36,843,111
		Sell offers	(\$412,532)	\$17,080,478	\$10,400,325	\$27,068,271
	Options	Buy bids	\$506	\$1,302,588	\$1,094,866	\$2,397,960
		Sell offers	\$83,391	\$4,106,104	\$2,423,493	\$6,612,988
Aug-15	Obligations	Buy bids	\$80,255	\$14,604,065	\$12,805,600	\$27,489,920
		Sell offers	(\$3,479,752)	\$11,900,107	\$11,647,533	\$20,067,888
	Options	Buy bids	\$1,872	\$1,208,914	\$809,947	\$2,020,733
		Sell offers	\$57,496	\$3,545,631	\$2,492,184	\$6,095,311
Sep-15	Obligations	Buy bids	\$1,630,612	\$12,189,005	\$10,198,226	\$24,017,843
		Sell offers	\$358,566	\$8,995,434	\$8,449,341	\$17,803,342
	Options	Buy bids	\$495	\$1,222,013	\$831,324	\$2,053,832
		Sell offers	\$26,129	\$2,705,884	\$2,197,030	\$4,929,043
Oct-15	Obligations	Buy bids	\$1,903,005	\$12,642,794	\$8,345,348	\$22,891,147
		Sell offers	\$561,997	\$10,797,329	\$7,260,665	\$18,619,990
	Options	Buy bids	\$0	\$1,554,390	\$729,719	\$2,284,108
		Sell offers	\$13,688	\$2,540,958	\$1,557,775	\$4,112,421
Nov-15	Obligations	Buy bids	\$1,213,851	\$11,643,030	\$7,713,134	\$20,570,016
		Sell offers	\$206,940	\$9,891,738	\$6,548,379	\$16,647,057
	Options	Buy bids	\$0	\$2,385,279	\$1,549,702	\$3,934,981
		Sell offers	\$13,833	\$2,746,512	\$2,166,151	\$4,926,496
Dec-15	Obligations	Buy bids	\$808,713	\$10,694,821	\$6,415,188	\$17,918,722
		Sell offers	\$255,028	\$7,855,695	\$4,575,367	\$12,686,091
	Options	Buy bids	\$2,278	\$1,275,897	\$845,480	\$2,123,655
		Sell offers	\$6,506	\$2,643,983	\$1,852,588	\$4,503,077
2014/2015*	Obligations	Buy bids	\$14,690,243	\$114,510,024	\$74,009,738	\$203,210,005
		Sell offers	\$10,416,134	\$96,121,532	\$63,750,015	\$170,287,681
	Options	Buy bids	\$163,116	\$6,269,159	\$4,616,812	\$11,049,087
		Sell offers	\$39,972	\$13,570,524	\$11,100,778	\$24,711,274
	Net Total		\$4,397,253	\$11,087,127	\$3,775,756	\$19,260,137
2015/2016**	Obligations	Buy bids	\$8,244,313	\$109,905,072	\$74,210,353	\$192,359,738
		Sell offers	(\$1,657,264)	\$85,000,154	\$61,210,868	\$144,553,757
	Options	Buy bids	\$5,151	\$10,349,983	\$6,710,402	\$17,065,536
		Sell offers	\$208,210	\$23,107,523	\$15,784,216	\$39,099,948
	Net Total		\$9,698,519	\$12,147,378	\$3,925,672	\$25,771,569

* Shows Twelve Months; ** Shows seven months

FTR Target Allocations

FTR target allocations were examined separately by source and sink contribution. Hourly FTR target allocations were divided into those that were benefits and liabilities and summed by sink and by source for the 2015 to 2016 planning period. Figure 13-11 shows the ten largest positive and negative FTR target allocations, summed by sink, for the 2015 to 2016 planning period. The top 10 sinks that produced financial benefit accounted for 48.7 percent of total positive target allocations during the 2015 to 2016 planning period with the Northern Illinois Hub accounting for 12.5 percent of all positive target allocations. The top 10 sinks that created liability accounted for 23.7 percent of total negative target allocations with the Western Hub accounting for 4.6 percent of all negative target allocations.

Figure 13-11 Ten largest positive and negative FTR target allocations summed by sink: 2015 to 2016 planning period

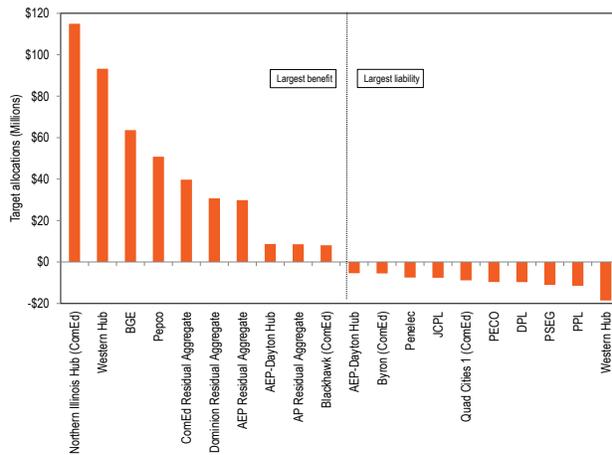
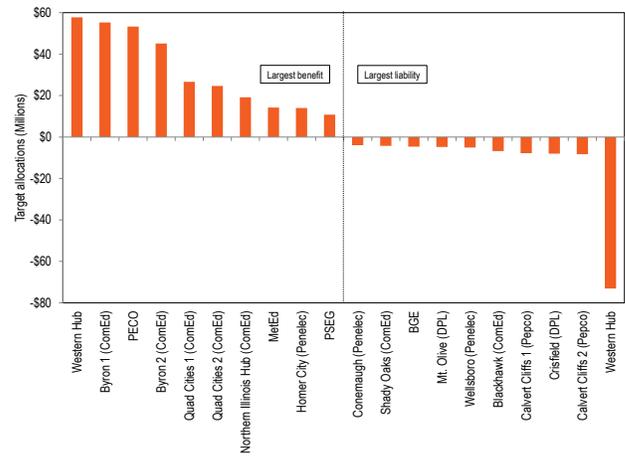


Figure 13-12 shows the ten largest positive and negative FTR target allocations, summed by source, for the 2015 to 2016 planning period. The top 10 sources with a positive target allocation accounted for 34.8 percent of total positive target allocations with the Western Hub accounting for 6.3 percent of total positive target allocations. The top 10 sources with a negative target allocation accounted for 31.6 percent of all negative target allocations, with the Western Hub accounting for 18.2 percent.

Figure 13-12 Ten largest positive and negative FTR target allocations summed by source: 2015 to 2016 planning period



Revenue Adequacy

Congestion revenue is created in an LMP system when all loads pay and all generators receive their respective LMPs. When load in a constrained area pays more than the amount that generators receive, excluding losses, positive congestion revenue exists and is available to cover the target allocations of FTR holders. The load MW exceed the generation MW in constrained areas because part of the load is served by imports using transmission capability into the constrained areas. That is why load, which pays for the transmission capability, receives ARRs to offset congestion in the constrained areas. Generating units that are the source of such imports are paid the price at their own bus, which does not reflect congestion in constrained areas. Generation in constrained areas receives the congestion price and all load in constrained areas pays the congestion price. As a result, load congestion payments are greater than the congestion-related payments to generation.²⁷ That is the source of the congestion revenue to pay holders of ARRs and FTRs. In general, FTR revenue adequacy exists when the sum of congestion credits is equal to or greater than the sum of congestion across the net positively valued FTRs. If PJM allocated FTRs equal to the transmission capability into constrained areas, FTR payouts would equal the sum of congestion.

²⁷ For an illustration of how total congestion revenue is generated and how FTR target allocations and congestion receipts are determined, see Table G-1, "Congestion revenue, FTR target allocations and FTR congestion credits: Illustration," *MMU Technical Reference for PJM Markets*, at "Financial Transmission and Auction Revenue Rights."

Revenue adequacy must be distinguished from the adequacy of FTRs as an offset against total congestion. Revenue adequacy is a narrower concept that compares total congestion revenues to the total target allocations across the specific paths for which FTRs were available and purchased. A path specific target allocation is not a guarantee of payment. The adequacy of FTRs as an offset against congestion compares ARR and FTR revenues to total congestion on the system as a measure of the extent to which ARRs and FTRs offset the actual, total congestion across all paths paid by market participants, regardless of the availability of ARRs or the availability or purchase of FTRs.

FTRs are paid each month from congestion revenues, both day-ahead and balancing. FTR auction revenues and excess revenues are carried forward from prior months and distributed back from later months. For example, in June 2014, there was \$2.9 million in excess congestion revenue, to be used to fund months later in the planning period that may have a revenue shortfall. At the end of a planning period, if some months remain not fully funded, an uplift charge is collected from any FTR market participants that hold FTRs during the planning period based on their pro rata share of total net positive FTR target allocations, excluding any charge to FTR holders with a net negative FTR position for the planning year. For example, the 2013 to 2014 planning period was not revenue adequate, and thus this uplift charge was collected from FTR participants. There was excess congestion revenue at the end of the 2014 to 2015 planning period, which is distributed to FTR participants in the same manner that the FTR uplift is applied.

FTR revenues are primarily comprised of hourly congestion revenue, from the day-ahead and balancing markets.²⁸ FTR revenues also include ARR excess, which is the difference between ARR target allocations and FTR auction revenues, and negative FTR target allocations, which is an income for the FTR market from FTRs with a negative target allocation. Competing use revenues are based on the Unscheduled Transmission Service Agreement between the New York Independent System Operator (NYISO) and PJM. This agreement sets forth the terms and conditions under which compensation is provided for transmission service in connection with transactions not scheduled directly or otherwise

prearranged between NYISO and PJM. Congestion revenues appearing in Table 13-31 include both congestion charges associated with PJM facilities and those associated with reciprocal, coordinated flowgates (M2M flowgates) in MISO and NYISO whose operating limits are respected by PJM.²⁹

Market to market operations resulted in NYISO, MISO and PJM redispatching units to control congestion on flowgates located in the other's area and in the exchange of payments for this redispatch. The Firm Flow Entitlement (FFE) represents the amount of historic flow that each RTO had created on each reciprocally coordinated flowgate (RCF) used in the market to market settlement process. The FFE establishes the amount of market flow that each RTO is permitted to create on the RCF before incurring redispatch costs during the market to market process. If the non-monitoring RTO's real-time market flow is greater than their FFE plus the approved MW adjustment from day-ahead coordination, then the non-monitoring RTO will pay the monitoring RTO based on the difference between their market flow and their FFE. If the non-monitoring RTO's real-time market flow is less than their FFE plus the approved MW adjustment from day-ahead coordination, then the monitoring RTO will pay the non-monitoring RTO for congestion relief provided by the non-monitoring RTO based on the difference between the non-monitoring RTO's market flow and their FFE.

For the 2014 to 2015 planning period, PJM paid MISO and NYISO a combined \$33.2 million for redispatch on the designated M2M flowgates, and for the 2015 to 2016 planning period PJM paid MISO and NYISO a combined \$16.7 million. The timing of the addition of new M2M flowgates may reduce FTR funding levels. MISO's ability to add flowgates dynamically throughout the planning period, which were not modeled in any previous PJM FTR auction, may result in oversold FTRs in PJM, and as a direct consequence, reduce FTR funding.

FTRs were paid at 100 percent of the target allocation level for the 2014 to 2015 and 2015 to 2016 planning periods. Congestion revenues are allocated to FTR holders based on FTR target allocations. PJM collected \$1,457.1 million of FTR revenues during the 2014 to

²⁸ When hourly congestion revenues are negative, it is defined as a net negative congestion hour.

²⁹ See "Joint Operating Agreement between the Midwest Independent System Operator, Inc. and PJM Interconnection, L.L.C." (December 11, 2008), Section 6.1 <<http://pjm.com/media/documents/merged-tariffs/miso-joa.pdf>>. (Accessed February 23, 2016)

2015 planning period, and \$572.8 million during the 2015 to 2016 planning period. Congestion in January 2014 was extremely high due to cold weather events, resulting in target allocations and congestion revenues that were unusually high for 2014. For the 2015 to 2016 planning period, the top sink and top source with the highest positive FTR target allocations were the Northern Illinois Hub and Western Hub. The top sink and top source with the largest negative FTR target allocation was the Western Hub.

Table 13-31 Total annual PJM FTR revenue detail (Dollars (Millions)): Planning periods 2014 to 2015 and 2015 to 2016

Accounting Element	2014/2015	2015/2016
ARR information		
ARR target allocations	\$765.9	\$564.2
FTR auction revenue	\$794.9	\$575.3
ARR excess	\$29.0	\$11.2
FTR targets		
Positive target allocations	\$1,551.6	\$636.0
Negative target allocations	(\$293.7)	(\$116.4)
FTR target allocations	\$1,257.8	\$519.6
Adjustments:		
Adjustments to FTR target allocations	(\$3.5)	(\$0.2)
Total FTR targets	\$1,254.4	\$519.5
FTR revenues		
ARR excess	\$29.0	\$11.2
Congestion		
Net Negative Congestion (enter as negative)	(\$69.6)	(\$13.2)
Hourly congestion revenue	\$1,463.8	\$588.0
Midwest ISO M2M (credit to PJM minus credit to Midwest ISO)	(\$33.2)	(\$16.7)
Adjustments:		
Excess revenues carried forward into future months	\$63.7	\$3.5
Excess revenues distributed back to previous months	\$0.0	\$0.0
Other adjustments to FTR revenues	\$0.0	\$0.0
Total FTR revenues		
Excess revenues distributed to other months	\$115.1	\$49.9
Net Negative Congestion charged to DA Operating Reserves	\$0.0	\$0.0
Total FTR congestion credits	\$1,457.1	\$572.8
Total congestion credits on bill (includes CEPSW and end-of-year distribution)	\$1,457.1	\$572.8
Remaining deficiency	(\$115.1)	(\$49.9)

This high level of revenue adequacy was primarily due to actions taken by PJM to address prior low levels of revenue adequacy. PJM's actions included PJM's assumption of higher outage levels and PJM's decision to include additional constraints (closed loop interfaces) both of which reduced system capability in the FTR auction model. PJM's actions led to a significant reduction in the allocation of Stage 1B and Stage 2 ARRs. For the 2014 to 2015 planning period, Stage 1B and Stage 2 ARR allocations were reduced 84.9 percent and 88.1 percent from the 2013 to 2014 planning period. For the 2015 to 2016 planning period, Stage 1B and Stage 2 ARR allocations were reduced 76.9 percent and

82.0 percent from the 2013 to 2014 planning period. The result of this change in modeling was also that available FTR capacity decreased for the planning period. This decrease resulted in an increase in FTR nodal prices for the Annual FTR Auction. The result was fewer available ARRs, but an increased dollar per MW value for those ARRs. The results are in the total ARR target allocations in Table 13-31 and the dollars per MW increase in Figure 13-4.

Table 13-31 presents the PJM FTR revenue detail for the 2014 to 2015 planning period and the 2015 to 2016 planning period.

Unallocated Congestion Charges

When total congestion revenue (day-ahead plus balancing) at the end of an hour is negative, target allocations in that hour (based on day-ahead CLMP values) are set to zero, and there is a congestion liability for that hour. At the end of the month, if excess ARR revenue and excess congestion from other hours and months are not adequate to offset the sum of these hourly differences, the unallocated congestion charges are included in day-ahead operating reserve charges so that the total congestion for the month is not less than zero. This charge is applied retroactively at the end of the month as additional day-ahead operating reserves charges and is never credited back to day-ahead operating reserves in the case of excess congestion. This means that within an hour, the congestion dollars collected from load were less than the congestion dollars paid to generation and there was not enough excess during the month to pay the difference. From 2010 through May 31, 2012, these charges were only made in three months, for a total of \$7.3 million. However, in the 2012 to 2013 planning period these charges were made in five months for a total of \$12.1 million in just one planning period.

Table 13-32 shows the monthly unallocated congestion charges made to day-ahead operating reserves for the 2012 to 2013 planning period through the 2015 to 2016 planning period. Months with no unallocated congestion are excluded from the table.³⁰

Table 13-32 Unallocated congestion charges: Planning period 2012 to 2013 through 2014 to 2015

Period	Charge
Oct-12	\$794,752
Dec-12	\$193,429
Jan-13	\$5,233,445
Mar-13	\$701,303
May-13	\$5,210,739
Jun-13	\$2,828,660
Sep-13	\$6,411,602
2012/2013	\$12,133,668
2013/2014	\$9,240,262

FTR target allocations are based on hourly prices in the Day-Ahead Energy Market for the respective FTR paths and are defined to be the revenue required to compensate FTR holders for congestion on those specific paths. FTR credits are paid to FTR holders and, depending on market

conditions, can be less than the target allocations. Table 13-33 lists the FTR revenues, target allocations, credits, payout ratios, congestion credit deficiencies and excess congestion charges by month. At the end of the 12-month planning period, excess congestion charges are used to offset any monthly congestion credit deficiencies.

The total row in Table 13-33 is not the sum of each of the monthly rows because the monthly rows may include excess revenues carried forward from prior months and excess revenues distributed back from later months. March 2015, had a revenue shortfall of \$38.7 million, but was fully funded using excess revenue from previous months.

³⁰ See the 2014 State of the Market Report for PJM: Volume II, Section 4: Energy Uplift at "Energy Uplift Charges," for the impact of Unallocated Congestion Charges on Operating Reserve rates.

Table 13-33 Monthly FTR accounting summary (Dollars (Millions)): Planning period 2014 to 2015 and 2015 to 2016

Period	FTR Revenues (with adjustments)	FTR Target Allocations	FTR Payout Ratio (original)	FTR Credits (with adjustments)	FTR Payout Ratio (with adjustments)	Monthly Credits Excess/Deficiency (with adjustments)
Jun-14	\$89.0	\$86.1	100.0%	\$89.0	100.0%	\$2.9
Jul-14	\$104.0	\$84.4	100.0%	\$104.0	100.0%	\$20.2
Aug-14	\$69.5	\$49.2	100.0%	\$69.5	100.0%	\$20.3
Sep-14	\$88.7	\$75.0	100.0%	\$88.7	100.0%	\$13.7
Oct-14	\$80.5	\$80.5	91.9%	\$80.5	100.0%	(\$6.7)
Nov-14	\$106.4	\$106.4	83.3%	\$106.4	100.0%	(\$17.7)
Dec-14	\$65.4	\$58.2	100.0%	\$58.2	100.0%	\$8.7
Jan-15	\$132.0	\$123.5	100.0%	\$123.5	100.0%	\$8.5
Feb-15	\$425.8	\$316.8	100.0%	\$316.8	100.0%	\$109.1
Mar-15	\$112.3	\$112.3	64.6%	\$112.3	100.0%	(\$38.7)
Apr-15	\$70.3	\$60.8	100.0%	\$70.3	100.0%	\$9.5
May-15	\$108.4	\$98.6	100.0%	\$108.4	100.0%	\$9.8
Summary for Planning Period 2014 to 2015						
Total	\$1,452.3	\$1,251.6		\$1,327.5	100.0%	\$139.6
Jun-15	\$103.8	\$83.8	100.0%	\$103.8	100.0%	\$20.0
Jul-15	\$88.0	\$67.5	100.0%	\$88.0	100.0%	\$20.5
Aug-15	\$57.3	\$47.6	100.0%	\$57.3	100.0%	\$9.7
Sep-15	\$77.5	\$76.6	100.0%	\$77.5	100.0%	\$0.9
Oct-15	\$84.8	\$82.6	100.0%	\$82.6	100.0%	\$2.2
Nov-15	\$91.9	\$92.3	99.5%	\$92.3	100.0%	(\$0.4)
Dec-15	\$66.1	\$69.1	95.6%	\$69.1	100.0%	(\$3.0)
Summary for Planning Period 2015 to 2016						
Total	\$569.3	\$519.4		\$570.6	100.0%	\$49.9

Figure 13-13 shows the original PJM reported FTR payout ratio by month, excluding excess revenue distribution, for January 2004 through December 2015. The months with payout ratios above 100 percent have excess congestion revenue and the months with payout ratios under 100 percent are revenue inadequate. Figure 13-13 also shows the payout ratio after distributing excess revenue across months within the planning period. If there are excess revenues in a given month, the excess is distributed to other months within the planning period that were revenue deficient. The payout ratio for revenue inadequate months in the current planning period may change if excess revenue is collected in the remainder of the planning period. March 2015, had high levels of negative balancing congestion that resulted in a payout ratio of 64.6 percent. However, there was enough excess from previous months to bring the payout ratio to 100 percent.

Figure 13-13 FTR payout ratio by month, excluding and including excess revenue distribution: January 2004 through December 2015

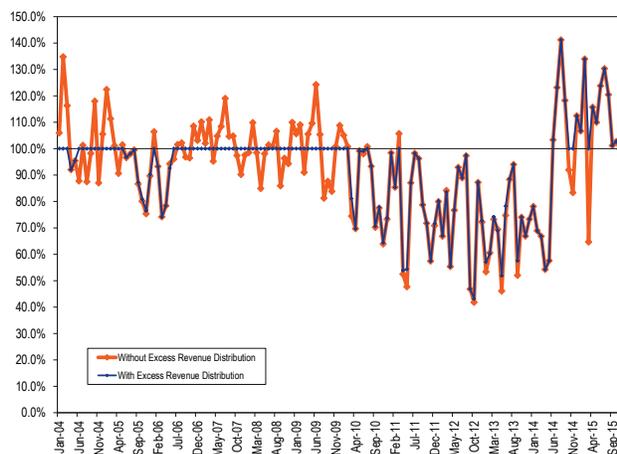


Table 13-34 shows the FTR payout ratio by planning period from the 2003 to 2004 planning period forward. Planning period 2013 to 2014 includes the additional revenue from unallocated congestion charges from Balancing Operating Reserves. For the 2014 to 2015 planning period, there was excess congestion revenue to pay target allocations resulting in a reported payout ratio of 116.2 percent for the planning period. This excess will be distributed to FTR participants pro rata based on their net positive target allocations.

Table 13-34 PJM reported FTR payout ratio by planning period

Planning Period	FTR Payout Ratio
2003/2004	97.7%
2004/2005	100.0%
2005/2006	90.7%
2006/2007	100.0%
2007/2008	100.0%
2008/2009	100.0%
2009/2010	96.9%
2010/2011	85.0%
2011/2012	80.6%
2012/2013	67.8%
2013/2014	72.8%
2014/2015	100.0%
2015/2016	100.0%

FTR Uplift Charge

At the end of the planning period, an uplift charge is applied to FTR holders. This charge is to cover the net of the monthly deficiencies in the target allocations calculated for individual participants. An individual participant's uplift charge is a pro rata charge, to cover this deficiency, based on their net target allocation with respect to the total net target allocation of all participants with net positive target allocations for the planning period. Participants pay an uplift charge that is a ratio of their share of net positive target allocations to the total net positive target allocations.

The uplift charge is only applied to, and calculated from, members with a net positive target allocation at the end of the planning period. Members with a net negative target allocation have their year-end target allocation set to zero for all uplift calculations. Since participants in the FTR Market with net positive target allocations are paying the uplift charge to fully fund FTRs, their payout ratio cannot be 100 percent. The end of planning period payout ratio is calculated as the participant's target allocations minus the uplift charge applied to them divided by their target allocations. The calculations of

uplift are structured so that, at the end of the planning period, every participant in the FTR Market with a positive net target allocation receives payments based on the same payout ratio. At the end of the planning period and the end of a given month no payout ratio is actually applied to a participant's target allocations. The payout ratio is simply used as a reporting mechanism to demonstrate the amount of revenue available to pay target allocations and represent the percentage of target allocations a participant with a net positive portfolio has been paid for the planning period. However, this same calculation is not accurate when calculating a single month's payout ratio as currently reported, where the calculation of available revenue is not the same.

The total planning period target allocation deficiency is the sum of the monthly deficiencies throughout the planning period. The monthly deficiency is the difference in the net target allocation of all participants and the total revenue collected for that month. The total revenue paid to FTR holders is based on the hourly congestion revenue collected, which includes hourly M2M, wheel payments and unallocated congestion credits.

Table 13-35 provides a demonstration of how the FTR uplift charge is calculated. In this example it is important to note that the sum of the net positive target allocations is \$32 and the total monthly deficiency is \$10. The uplift charge is structured so that those with higher target allocations pay more of the deficit, which ultimately impacts their net payout. Also, in this example, and in the PJM settlement process, the monthly payout ratio varies for all participants, but the uplift charge is structured so that once the uplift charge is applied the end of planning period payout ratio is the same for all participants.

For the 2012 to 2013 planning period, the total deficiency was \$291.8 million. The top ten participants with the highest target allocations paid 53.6 percent of the total deficiency for the planning period. All of the uplift money is collected from individual participants, and distributed so that every participant experiences the same payout ratio. This means that some participants subsidize others and receive less payout from their FTRs after the uplift is applied, while others receive a subsidy and get a higher payout after the uplift is applied. In this example, participants 1 and 5 are paid less after the

uplift charge is applied, while participants 3 and 4 are paid more.

Table 13-35 End of planning period FTR uplift charge example

Participant	Net Target Allocation	Total Monthly Payment	Monthly Deficiency	Uplift Charge	Net Payout	Payout Change	Monthly Payout Ratio	EOPP Payout Ratio
1	\$10.00	\$8.00	\$2.00	\$3.13	\$6.88	\$(1.13)	80.0%	68.8%
2	(\$4.00)	\$0.00	\$0.00	\$0.00	(\$4.00)	\$-	100.0%	100.0%
3	\$15.00	\$10.00	\$5.00	\$4.69	\$10.31	\$0.31	66.7%	68.8%
4	\$3.00	\$1.00	\$2.00	\$0.94	\$2.06	\$1.06	33.3%	68.8%
5	\$4.00	\$3.00	\$1.00	\$1.25	\$2.75	\$(0.25)	75.0%	68.8%
Total	\$28.00	\$22.00	\$10.00	\$10.00	\$18.00	\$0.00		

Revenue Adequacy Issues and Solutions

PJM Reported Payout Ratio

The payout ratios shown in Table 13-36 reflect the PJM reported payout ratios for each month of the planning period. These reported payout ratios equal congestion revenue divided by the sum of the net positive and net negative target allocations for each hour of the month. This does not correctly measure the payout ratio actually received by positive target allocation FTR holders in the month, but provides an estimate of the ratio based on the approach to end of planning period calculations, including cross subsidies.

The payout ratio is intended to measure the proportion of the target allocation received by the holders of FTRs with positive target allocations in a month. In fact, the actual monthly payout ratio includes the net negative target allocations as a source of funding for FTRs with net positive target allocations in an hour. Revenue from FTRs with net negative target allocations in an hour is included with congestion revenue when funding FTRs with net positive target allocations.³¹ Also included in this revenue is any M2M charge or credit for the month and any excess ARR revenues for the month. The revenue and net target allocations are then summed over the month to calculate the monthly payout ratio. There is no payout ratio applied on a monthly basis, each participant receives a different share of the available revenue based on availability, it is simply used as a reporting mechanism. At the end of a given month, a participant's FTR payments are a proportion of the congestion credits collected, based on the participant's share of the total monthly target allocation. The payout ratio is only used

and calculated at the end of the planning period after uplift is applied to each participant. The actual monthly payout ratio received by FTR holders equals congestion revenue plus the net negative target allocations divided by the net positive target allocations for each hour. The actual payout ratio received by the holders of positive target allocation FTRs, reported on a monthly basis, is greater than reported by PJM.

Table 13-36 shows the PJM reported and actual monthly payout ratios for 2015. On a month to month basis, the payout ratio currently reported by PJM does not take into account all sources of revenue available to pay FTR holders. On a monthly basis, this provides a slightly understated payout ratio. In the first four months of the 2014 to 2015 planning period, there was an excess of FTR revenues, so total funding was actually over 100 percent. Additional revenue was distributed to future months of the planning period to cover any shortfall or be distributed prorata at the end of the planning period.

Table 13-36 PJM Reported and Actual Monthly Payout Ratios: Planning period 2015 to 2016

	Reported Monthly Payout Ratio	Actual Monthly Payout Ratio
Jan-15	100.0%	100.0%
Feb-15	100.0%	100.0%
Mar-15	100.0%	100.0%
Apr-15	100.0%	100.0%
May-15	100.0%	100.0%
Jun-15	100.0%	100.0%
Jul-15	100.0%	100.0%
Aug-15	100.0%	100.0%
Sep-15	100.0%	100.0%
Oct-15	100.0%	100.0%
Nov-15	100.0%	100.0%
Dec-15	100.0%	100.0%

Netting Target Allocations within Portfolios

Currently, FTR target allocations are netted within each organization in each hour. This means that within an hour, positive and negative target allocations within an organization's portfolio are offset prior to the application of the payout ratio to the positive target allocation FTRs. The payout ratios are also calculated based on these net FTR positions. Elimination of portfolio netting would correctly account for negative target allocations as a source of revenue to pay positive

³¹ See PJM, "Manual 28: Operating Agreement Accounting," Revision 72 (December 17, 2015), p. 57-58.

target allocations. It would also apply the payout ratio directly to a participant's positive target allocations before subtracting negative target allocations, rather than applying the payout ratio to a participant's net portfolio. Applying the payout ratio to a participant's net portfolio results in unequal payout ratios depending on a participant's portfolio construction.

The current method requires those with fewer negative target allocation FTRs to subsidize those with more negative target allocation FTRs. The current method treats a positive target allocation FTR differently depending on the portfolio of which it is a part. But all FTRs with positive target allocations should be treated in exactly the same way, which would eliminate this form of cross subsidy.

For example, a participant has \$200 of positive target allocation FTRs and \$100 of negative target allocation FTRs and the payout ratio is 80 percent. Under the current method, the positive and negative positions are first netted to \$100 and then the payout ratio is applied. In this example, the holder of the portfolio would receive 80 percent of \$100, or \$80.

The correct method would first apply the payout ratio to FTRs with positive target allocations and then net FTRs with negative target allocations. In the example, the 80 percent payout ratio would first be applied to the positive target allocation FTRs, 80 percent of \$200 is \$160. Then the negative target allocation FTRs would be netted against the positive target allocation FTRs, \$160 minus \$100, so that the holder of the portfolio would receive \$60.

If done correctly, the payout ratio would also change, although the total net payments made to or from participants would not change. The sum of all positive and negative target allocations is the same in both methods. The net result of this change would be that holders of portfolios with smaller shares of negative target allocation FTRs would no longer subsidize holders of portfolios with larger shares of negative target allocation FTRs.

Under the current method all participants with a net positive target allocation in a month are paid a payout ratio based on each participant's net portfolio position. The correct approach would calculate payouts to FTRs

with positive target allocations, without netting in an hour. This would treat all FTRs the same, regardless of a participant's portfolio. This approach would also eliminate the requirement that participants with larger shares of positive target allocation FTRs subsidize participants with larger shares of negative target allocation FTRs.

Elimination of portfolio netting should also be applied to the end of planning period FTR uplift calculation. With this approach, negative target allocations would not offset positive target allocations at the end of the planning period when allocating uplift. The FTR uplift charge would be based on participants' share of the total positive target allocations paid for the planning period.

Table 13-37 shows an example of the effects of calculating FTR payouts on a per FTR basis rather than the current method of portfolio netting for four hypothetical organizations for an example hour. In this example, there was \$45 in congestion revenue collected, which results in a payout ratio of 39.1 percent for positive target allocations when ignoring any contribution by negative or net negative target allocations. With portfolio netting, the total revenue available to pay positive target allocations is \$50, which is the \$45 in congestion collected plus the \$5 generated by the net negative target allocation of Participant 4, which results in a payout ratio of 41.7 percent for net positive target allocations. Without portfolio netting there is \$110 in total revenue available, which is the \$45 in congestion collected plus the \$65 in negative target allocations from all participants, which results in a payout ratio of 61.1 percent for positive target allocations.

The positive and negative TA columns show the total positive and negative target allocations, calculated separately, for each organization. The percent negative target allocations is the share of the portfolio which is negative target allocation FTRs. The net target allocation is the net of the positive and negative target allocations for the given hour. The FTR netting payout column shows what a participant would see on their bill, including payout ratio adjustments, under the current method. The per FTR payout column shows what a participant would see on their bill, including payout ratio adjustments, if FTR target allocations were done correctly. In this example, the actual monthly payout ratio is 41.7 percent. If portfolio netting were

eliminated, the actual monthly payout ratio would rise to 61.1 percent.

This table shows the effects of a per FTR target allocation calculation on individual participants. The total payout does not change, but the allocation across individual participants does.

The largest change in payout is for participants 1 and 2. Participant 1, who has a large proportion of FTRs with negative target allocations, receives less payment. Participant 2, who has no negative target allocations, receives more payment.

Table 13-37 Example of FTR payouts from portfolio netting and without portfolio netting

Participant	Positive Target Allocation	Negative Target Allocation	Percent Negative Target Allocation	Net TA	FTR Netting Payout (Current)	No Netting Payout (Proposed)	Percent Change
1	\$60.00	(\$40.00)	66.7%	\$20.00	\$8.33	(\$3.33)	(140.0%)
2	\$30.00	\$0.00	0.0%	\$30.00	\$12.50	\$18.33	46.7%
3	\$90.00	(\$20.00)	22.2%	\$70.00	\$29.17	\$35.00	20.0%
4	\$0.00	(\$5.00)	100.0%	(\$5.00)	(\$5.00)	(\$5.00)	0.0%
Total	\$180.00	(\$65.00)	-	\$115.00	\$45.00	\$45.00	-

Per FTR Positive Allocation column shows the total value of the hourly positive target allocation FTRs without netting. The Per Negative Allocation column shows the total value of the hourly negative target allocation FTRs without netting.

The Reported Payout Ratio column is the monthly payout ratio as currently reported by PJM, calculated as total revenue divided by the sum of the net positive and net negative target allocations. The No Netting FTR Payout Ratio column is the payout ratio that participants with positive target allocations would receive if FTR payouts were calculated without portfolio netting, calculated by dividing the total revenue minus

Table 13-38 Monthly positive and negative target allocations and payout ratios with and without hourly netting: Planning period 2014 to 2015 and 2015 to 2016

	Net Positive Target Allocations	Net Negative Target Allocations	Per FTR Positive Target Allocations	Per FTR Negative Target Allocations	Total Congestion Revenue	Reported Payout Ratio (Current)	No Netting Payout Ratio (Proposed)
Jan-15	\$146,311,151	(\$22,842,202)	\$410,273,039	(\$283,654,558)	\$131,999,162	100.0%	100.0%
Feb-15	\$374,621,111	(\$57,865,312)	\$1,037,653,444	(\$719,673,940)	\$425,826,022	100.0%	100.0%
Mar-15	\$131,345,522	(\$19,051,127)	\$414,369,580	(\$300,458,779)	\$112,208,980	100.0%	100.0%
Apr-15	\$88,627,007	(\$27,869,815)	\$272,864,686	(\$211,944,617)	\$70,299,122	100.0%	100.0%
May-15	\$129,206,865	(\$30,649,084)	\$392,526,758	(\$293,928,392)	\$108,377,660	100.0%	100.0%
Jun-15	\$101,492,683	(\$17,638,087)	\$222,590,294	(\$139,100,325)	\$103,801,957	100.0%	100.0%
Jul-15	\$84,827,111	(\$17,321,775)	\$200,161,717	(\$132,638,752)	\$87,968,263	100.0%	100.0%
Aug-15	\$58,681,563	(\$11,121,312)	\$137,089,167	(\$89,562,397)	\$57,290,482	100.0%	100.0%
Sep-15	\$92,594,711	(\$15,996,098)	\$231,109,085	(\$154,468,134)	\$77,511,284	100.0%	100.0%
Oct-15	\$98,581,703	(\$16,026,518)	\$243,208,767	(\$160,641,784)	\$84,759,219	100.0%	100.0%
Nov-15	\$109,318,449	(\$17,000,203)	\$263,233,848	(\$170,879,749)	\$92,318,246	100.0%	100.0%
Dec-15	\$90,426,000	(\$21,292,916)	\$247,346,193	(\$178,213,108)	\$69,082,410	100.0%	100.0%
2014/2015 Total	\$1,549,603,363	(\$294,939,767)	\$4,208,635,791	(\$2,947,744,437)	\$1,413,528,267	100.0%	100.0%
2015/2016 Total	\$635,922,219	(\$116,396,908)	\$1,544,739,071	(\$1,025,504,249)	\$572,731,862	100.0%	100.0%

Table 13-38 shows the total value for the 2014 to 2015 and 2015 to 2016 planning periods of FTRs with positive and negative target allocations. The Net Positive Target Allocation column shows the value of all portfolios with an hourly net positive value after negative target allocation FTRs are netted against positive target allocation FTRs. The Net Negative Target Allocation column shows the value of all portfolios with an hourly net negative value after negative target allocation FTRs are netted against positive target allocation FTRs. The

per FTR negative target allocation by the per FTR positive target allocations. The total revenue available to fund the holders of positive target allocation FTRs is calculated by adding any negative target allocations to the congestion credits for that month.

If netting within portfolios were eliminated and the payout ratio were calculated correctly, the payout ratio for the 2013 to 2014 planning period would have been 87.5 percent instead of the reported 72.8. For the 2014

to 2015 and 2015 to 2016 planning periods there was no revenue inadequacy, so eliminating portfolio netting would have no effect. March 2015 experienced revenue inadequacy, but excess revenue was distributed from previous months to ensure full funding. For months with no revenue inadequacies there is no change in payout ratio.

Portfolio Dependent Payout Ratio

Under the current portfolio netting rules, negative target allocations are first netted against positive, and then the payout ratio is applied. This results in two significant problems with the current method. First is that a participant can shield itself from both monthly revenue inadequacy and the end of planning period uplift charge by shrinking the size of their positive target allocations. This is advantageous because the participant can still be profiting from their negative target allocations if they are paid to take counter flow positions and pay back less than they received. Additionally, it results in positive target allocations receiving different payout ratios depending on the composition of the portfolio they are in. All positive target allocation FTR should be treated equally, regardless of the portfolio they are in, and this can only be accomplished by eliminating portfolio netting. Not treating all FTRs equally results in participants with more negative target allocations receiving a subsidy by reducing the effective payout ratio to participants with fewer negative target allocations. The reduced payouts to participants with fewer negative target allocations subsidize increased payout ratios to participants with larger negative target allocations, and is an unbalanced distribution of available congestion revenue collected.

Table 13-39 demonstrates the impact on the payout ratio to positive target allocation FTRs with and without portfolio netting. In the example the total congestion collected is \$4,750 and the total net target allocation is \$9,500, resulting in a reported payout ratio of 50.0 percent. With portfolio netting, the net target allocation is simply multiplied by the payout ratio to calculate the congestion revenue a participant receives. For Participant 1, this is \$250 multiplied by 0.5 for a total revenue received of \$125. The revenue to positive TA column is an indication of how much revenue the positive target allocations, which are the only part of a portfolio receiving available revenue, of a participant need to be

paid in order to reach the congestion revenue received. For participant 1, they are effectively being paid \$875 of their \$1,000 so that the congestion revenue received can be \$125. Another way to state this is the participant is effectively paying themselves their negative target allocations first, and then receiving revenue based on their net target allocation. The result of this is that Participant 1's positive target allocations are effectively granted a payout ratio of 87.5 percent simply because they hold negative target allocations, while Participant 3, who holds no negative target allocations, is only paid at a 50.0 percent payout ratio.

Without portfolio netting all participants are paid at the same effective payout ratio for their positive target allocations. Counting negative target allocations as a source of revenue raises the payout ratio to 54.5 percent. Without portfolio netting, the payout ratio is first applied to positive target allocations, then the participant's negative target allocations are added. The result of this calculation is that each participant is paid an equal 54.5 percent regardless of their portfolio's negative target allocations. In this example Participant 1 pays ends up paying \$204.55 into the congestion pot, in net, while Participant 3 is paid 54.5 percent of the positive target allocations, resulting in a payment of \$4,745.45. Eliminating portfolio netting is the only way to treat positive target allocations equally across all portfolios, and eliminates the subsidy positive target allocations holders are paying to negative target allocation holders.

Table 13-39 Change in positive target allocation payout ratio given portfolio construction

Participant	Congestion = \$4,750 Net TA = \$9,500				With Netting			Without Netting		
	Positive Target Allocations	Negative Target Allocations	Net Target Allocations	Reported Payout Ratio	Congestion Revenue Received	Revenue to Positive TA	Calculated Positive TA Payout Ratio	Congestion Revenue Received	Revenue to Positive TA	Calculated Positive TA Payout Ratio
1	\$1,000.00	(\$750.00)	\$250.00	50.0%	\$125.00	\$875.00	87.5%	(\$204.55)	\$545.45	54.5%
2	\$750.00	(\$200.00)	\$550.00	50.0%	\$275.00	\$475.00	63.3%	\$209.09	\$409.09	54.5%
3	\$8,700.00	\$0.00	\$8,700.00	50.0%	\$4,350.00	\$4,350.00	50.0%	\$4,745.45	\$4,745.45	54.5%
Total	\$10,450.00	(\$950.00)	\$9,500.00	-	\$4,750.00	\$5,700.00	-	\$4,750.00	\$5,700.00	-

Mathematically Equivalent FTRs

A single FTR can be broken into multiple FTRs. The newly formed set of multiple FTRs can have the same net target allocation as long as the start and end points of the constituent end points are, in net, the same as the original. Opponents of the elimination of FTR netting have claimed that without netting this would no longer be true. However, this assertion does not account for revenues from negative target allocation FTR paths in the mathematically equivalent set of FTRs. Appropriately including these revenues results in mathematical equivalence between the single FTR and that same FTR broken into a constituent set of FTRs with the same start and end point.

Table 13-41 shows the effects on a participant with and without portfolio netting under three distinct scenarios. Table 13-40 provides the day-ahead CLMP values for each node used in the example. In this example, a participant can either buy an FTR position directly from A to B or can break it into individual pieces with the net effect of an FTR from A to B with a net target allocation of \$5. In this example, there was \$3.60 in congestion collected, due to a payout ratio of 72.0 percent and a total payout in each of the three scenarios of \$3.60. This payout amount is simply the payout ratio of 72.0 percent multiplied by the net target allocations of \$5 in each scenario.

With the elimination of netting, if the additional revenue created by considering positive and negative target allocations separately is disregarded, it appears as if the payout for the same net FTR is drastically different depending on the composition of the FTR. The results of this mistake are payouts of \$3.60, -\$0.60 and -\$25.80 for the same net FTR in each distinct scenario. However, if the negative target allocations are properly accounted for as a source of revenue when considering congestion collected, the total revenue available increases thereby increasing the payout ratio for each scenario's positive target allocations. The total revenue available is the

\$3.60 in congestion collected plus the negative target allocations, resulting in revenue available to pay positive target allocations of \$3.60, \$18.60 and \$108.60 with payout ratios to positive target allocations of 72.0 percent (unchanged due to no negative target allocations), 93.0 percent and 98.7 percent. Multiplying these correct payout ratios by the scenario's positive target allocations, and then adding the scenario's negative target allocations results in a net payout of \$3.60 for each scenario.

The results of this example demonstrate the mathematical fact that no matter how an FTR path is constructed, as a single FTR or a mathematically equivalent set of FTRs, the total payment the FTR path will be the same. Attempts to disprove this ignore the revenues from the constituent FTR counter flow positions and the resulting change in payout ratio that is experienced by positive target allocations. A net FTR may be constructed in any manner and the resultant total payout will be equivalent with and without portfolio netting.

Table 13-40 Nodal day-ahead CLMPs

Node	DA CLMP
A	\$20
B	\$25
C	\$40
D	\$100
E	\$10

Table 13-41 Mathematically equivalent FTR payments with and without portfolio netting

FTR Path(s)	Positive TA	Negative TA	Net TA	Available Revenue Netting	Netting Revenue Received	No Netting Revenue Received (Incorrect)	Available Revenue No Netting	Payout Ratio No Netting	Correct No Netting Revenue Received
A-B	\$5.00	\$0.00	\$5.00	\$3.60	\$3.60	\$3.60	\$3.60	72.0%	\$3.60
A-C, C-B	\$20.00	-\$15.00	\$5.00	\$3.60	\$3.60	-\$0.60	\$18.60	93.0%	\$3.60
A-C, C-E, E-D, D-B	\$110.00	-\$105.00	\$5.00	\$3.60	\$3.60	-\$25.80	\$108.60	98.7%	\$3.60

Counter Flow FTRs and Revenues

The current rules create an asymmetry between the treatment of counter flow and prevailing flow FTRs. The payout to the holders of counter flow FTRs is not affected when the payout ratio is less than 100 percent. There is no reason for that asymmetric treatment.

For a prevailing flow FTR, the target allocation would be subject to a reduced payout ratio, while a counter flow FTR holder would not be subject to the reduced payout ratio. The profitability of the prevailing flow FTRs is affected by the payout ratio while the profitability of the counter flow FTRs is not affected by the payout ratio.

Counter flow FTR holders make payments over the planning period, in the form of negative target allocations. These negative target allocation FTRs are paid at 100 percent regardless of whether positive target allocation FTRs are paid at less than 100 percent.

A counter flow FTR is profitable if the hourly negative target allocation is smaller than the hourly auction payment they received. A prevailing flow FTR is profitable if the hourly positive target allocation is larger than the auction payment they made.

There is no reason to treat counter flow FTRs more favorably than prevailing flow FTRs. Counter flow FTRs should also be affected when the payout ratio is less than 100 percent. This would mean that counter flow FTRs would pay back an increased amount, parallel to the decreased payments to prevailing flow FTRs. The adjusted payout ratio would evenly divide funding between counter flow FTR holders and prevailing flow FTR holders by increasing negative counter flow target allocations by the same amount it decreases positive target allocations.

Table 13-42 provides an example of how the counter flow adjustment method would impact a two FTR system. In this example, there is \$15 of total congestion

revenue available, corresponding to a reported payout ratio of 75 percent and an actual payout ratio of 87.5 percent. In the example, the profit is shown with and without the counter flow adjustment. As the example shows, the profit of a counter flow FTR does not change when there is a payout ratio less than 100 percent, while the profit of a prevailing flow FTR is reduced. Applying the payout ratio to counter flow FTRs distributes the funding penalty evenly to both prevailing and counter flow FTR holders.

Table 13-42 Example implementation of counter flow adjustment method

	Prevailing A-B 10MW	Counter C-D 10MW
Auction Cost	\$50.00	(\$30.00)
Target Allocation	\$40.00	(\$20.00)
Payout	\$30.00	(\$20.00)
Profit without revenue inadequacy	(\$10.00)	\$10.00
Profit after revenue inadequacy	(\$20.00)	\$10.00
Payout for Positive TA	\$35.00	(\$20.00)
Profit for Positive TA	(\$15.00)	\$10.00
Payout after CF Adjustment	\$36.67	(\$21.67)
Profit after CF Adjustment	(\$13.33)	\$8.33
Profit Difference	\$1.67	(\$1.67)

Table 13-43 shows the monthly positive, negative and total target allocations.³² Table 13-43 also shows the total congestion revenue available to fund FTRs, as well as the total revenue available to fund positive target allocation FTR holders on a per FTR basis and on a per FTR basis with counter flow payout adjustments. Implementing this change to the payout ratio for counter flow FTRs would result in an additional \$188.4 million (27.8 percent of difference between revenues and total target allocations) in revenue available to fund positive target allocations for the 2013 to 2014 planning period. If this change were implemented after excess planning period revenue was distributed, it would not result in additional revenue for the 2014 to 2015 or 2015 to 2016 planning periods.

³² Reported payout ratio may differ between Table 13-38 and Table 13-43 due to rounding differences when netting target allocations and considering each FTR individually.

However, if this change were implemented before excess planning period revenues were distributed, there would be an increase in the revenue available each month to pay prevailing flow FTRs, resulting in a decrease in the amount of excess from previous months that needs to be used to achieve revenue adequacy. This can be seen by a slight difference in the total revenue and adjusted counter flow total revenue columns for March during the 2014 to 2015 planning period and November and December for the 2015 to 2016 planning period that was not revenue adequate. The result of this would be \$1.1 million in additional revenue generated for the first seven months of the 2015 to 2016 planning period.

The result of removing portfolio netting and applying a payout ratio to counter flow FTRs would increase the calculated payout ratio for the 2013 to 2014 planning period from the reported 72.8 percent to 91.0 percent. For months with no revenue inadequacies there is no change in payout ratio.

Table 13-43 Counter flow FTR payout ratio adjustment impacts: Planning period 2014 to 2015 and 2015 to 2016

	Positive Target Allocations	Negative Target Allocations	Total Target Allocations	Total Congestion Revenue	Reported Payout Ratio*	Total Revenue Available	Adjusted Prevailing Flow Payout Ratio	Adjusted Counter Flow Payout Ratio	Adjusted Counter Flow Revenue Available	Additional Revenue Generated
Jan-15	410,273,039.40	(283,654,557.66)	\$126,618,482	\$131,999,162	100.0%	\$415,653,720	100.0%	100.0%	\$415,653,720	\$0
Feb-15	1,037,653,444.39	(719,673,940.00)	\$317,979,504	\$425,826,022	100.0%	\$1,145,499,962	100.0%	100.0%	\$1,145,499,962	\$0
Mar-15	414,369,579.96	(300,458,779.30)	\$113,910,801	\$112,294,395	98.6%	\$412,753,174	100.0%	100.0%	\$413,256,180	\$503,006
Apr-15	272,864,686.11	(211,944,616.99)	\$60,920,069	\$70,299,122	100.0%	\$282,243,739	100.0%	100.0%	\$282,243,739	\$0
May-15	392,526,758.17	(293,928,391.90)	\$98,598,366	\$108,377,660	100.0%	\$402,306,052	100.0%	100.0%	\$402,306,052	\$0
Jun-15	222,590,293.62	(139,100,324.66)	\$83,489,969	\$103,747,323	100.0%	\$242,847,647	100.0%	100.0%	\$242,847,647	\$0
Jul-15	200,161,717.10	(132,638,752.10)	\$67,522,965	\$87,968,263	100.0%	\$220,607,015	100.0%	100.0%	\$220,607,015	\$0
Aug-15	137,089,167.17	(89,562,397.25)	\$47,526,770	\$57,290,482	100.0%	\$146,852,879	100.0%	100.0%	\$146,852,879	\$0
Sep-15	231,109,085.00	(154,468,134.20)	\$76,640,951	\$77,511,284	100.0%	\$231,979,418	100.0%	100.0%	\$231,979,418	\$0
Oct-15	243,208,767.05	(160,641,783.85)	\$82,566,983	\$84,759,219	100.0%	\$245,401,003	100.0%	100.0%	\$245,401,003	\$0
Nov-15	263,233,848.17	(170,879,749.04)	\$92,354,099	\$91,923,077	99.5%	\$262,802,827	100.0%	100.0%	\$262,939,878	\$137,051
Dec-15	247,346,192.69	(178,213,108.16)	\$69,133,085	\$66,093,057	95.6%	\$244,306,166	100.0%	100.0%	\$245,277,728	\$971,563
Total 2014/2015	\$4,218,482,305	(\$2,955,253,710)	\$1,263,228,595	\$1,452,257,998	100.0%	\$4,407,511,707	100.0%	100.0%	\$4,407,511,707	\$503,006
Total 2015/2016	1,544,739,070.80	(1,025,504,249.26)	\$519,234,822	\$569,292,705	100.0%	\$1,594,796,954	100.0%	100.0%	\$1,595,905,568	\$1,108,614

* Reported payout ratios may vary due to rounding differences when netting

Figure 13-14 shows the FTR surplus, collected day-ahead, balancing and total congestion payments from January 2005 through December 2015. August and December 2014 had positive total balancing congestion of \$0.03 million and \$4.4 million. March 2015 had balancing congestion of \$70.0 million.

Figure 13-14 FTR surplus and the collected Day-Ahead, Balancing and Total congestion: January 2005 through December 2015

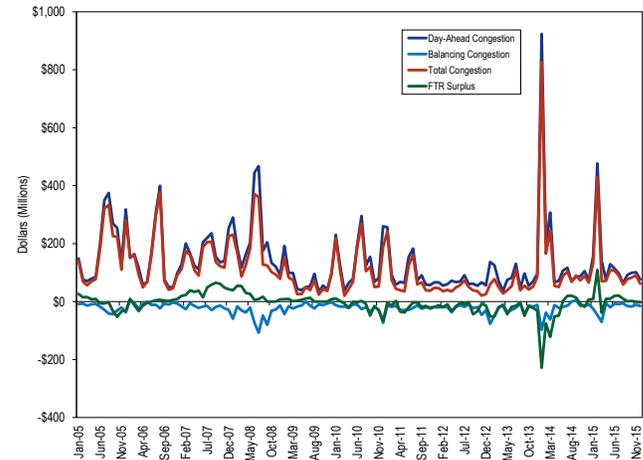
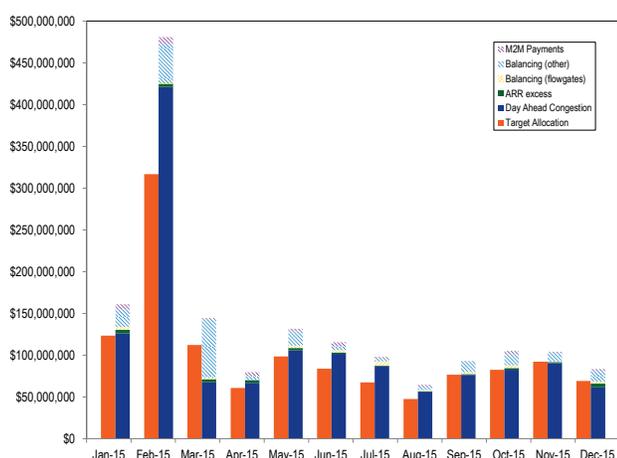


Figure 13-15 shows the relationship among monthly target allocations, balancing congestion, M2M payments and day-ahead congestion. The left column is the target allocations for all FTRs for the month. The total height of the right column is day-ahead congestion revenues and the stripes are reductions to total congestion revenues. When the total height of the solid segments in the right column exceeds the height of the left column, the month is revenue adequate. For example, February 2015 was revenue adequate by \$109.1 million. In the 2014 to 2015 planning period, day-ahead congestion exceeded target allocations and offsets were small, resulting in payout ratios over 100 percent. March was revenue inadequate by \$38.7 million due to a large negative balancing congestion charge, but there was enough excess revenue in other months in the planning period to fully fund the month.

Figure 13-15 FTR target allocation compared to sources of positive and negative congestion revenue



ARRs as a Congestion Offset for Load

Load pays for the transmission system and contributes all congestion revenues. FTRs and later ARR holders were intended to return congestion revenues to load. With the implementation of the current FTR/ARR design, other participants are allowed to receive a portion of the congestion revenues.

Table 13-44 compares the revenue received by ARR holders and total congestion for the 2013 to 2014, 2014 to 2015 and the first seven months of the 2015 to 2016 planning period. This compares the total offset provided

to all ARR holders including all ARRs converted to self scheduled FTRs to the total congestion revenues. ARR credits are calculated as the product of the ARR MW and the cleared price of the ARR path from the Annual FTR Auction. The FTR credits represent the total self scheduled FTR target allocations for FTRs held by ARR holders, adjusted by the FTR payout ratio. ARR holders that elect to self schedule into FTRs are paid the daily ARR credits for the ARR, and then pay the daily auction price of the self scheduled FTRs, netting the cost of the FTRs to zero. This is accounted for in the ARR credits column by subtracting the cost of the FTR from the ARR credits.

The total ARR/FTR offset is the sum of the ARR and self scheduled FTR credits. The congestion column shows the total amount of congestion collected in the Day-Ahead Energy Market and the balancing energy market. The percent offset is the percent of total, system wide, congestion offset by ARR and self scheduled FTR credits that ARR holders receive.

Table 13-44 shows the offset provided by ARRs and self scheduled FTRs for the entire 2013 to 2014, 2014 to 2015 planning period and the first seven months of the 2015 to 2016 planning period. ARR and FTR revenues offset 42.4 percent of Day-Ahead Energy Market and the balancing energy market for the 2013 to 2014 planning period and 63.8 percent for the 2014 to 2015 planning period. For the first seven months of the 2015 to 2016 planning period ARRs and self scheduled FTRs offset 85.8 percent of total congestion costs.

This demonstrates the inadequacies of the current ARR/FTR design. The goal of the design should be to return 100 percent of the congestion revenues to the load. But the actual results fall well short of that goal.

Table 13-44 ARR and FTR total congestion offset (in millions) for ARR holders: Planning periods 2014 to 2015 and 2015 to 2016³³

Planning Period	ARR Credits	FTR Credits	Total Congestion	Total ARR/FTR Offset	Percent Offset
2013/2014	\$337.7	\$414.9	\$1,777.1	\$752.6	42.4%
2014/2015	\$482.4	\$404.4	\$1,390.9	\$886.8	63.8%
2015/2016*	\$372.3	\$128.0	\$573.0	\$500.3	87.3%

*Shows seven months through December 31, 2015

³³ FTR Credits does not include any end of planning period excess or shortfall distribution.

Credit Issues

There were two collateral defaults and seven payment defaults for the first nine months of 2015 for Intergrid Mideast Group, LLC. The two collateral defaults totaled \$710,300 and the seven payment defaults totaled \$1,726,641. There was one other collateral default for the first nine months of 2015 for \$35,000, which was promptly cured. There were no additional defaults in the last quarter of 2015.

PJM terminated Intergrid's membership as of April 23, 2015 and FERC approved PJM's termination as of June 23, 2015. Some of Intergrid's invoices were paid through Intergrid, a guarantor or cash collateral posted with PJM. Intergrid held FTRs at the time they were declared in default. PJM has liquidated all of Intergrid's FTR positions in accordance with Section 7.3.9 of the Operating Agreement.³⁴ PJM liquidated 500.8 MW of Intergrid's FTRs in the June Monthly Balance of Planning Period Auction for a net of \$509,732 in revenue. PJM also liquidated 417.2 MW of Long Term FTRs for various planning periods for a net of \$230,318 in cost. The net revenue result of Intergrid's FTR liquidation is \$279,414. PJM has notified its Members that the Intergrid default will not result in any default allocation assessments in accordance with Section 15.2.2 of the Operating Agreement.³⁵

FTR Forfeitures

An FTR holder may be subject to forfeiture of any profits from an FTR if it meets the criteria defined in Section 5.2.1 (b) of Schedule 1 of the PJM Operating Agreement. If a participant has a cleared increment offer or decrement bid for an applicable hour at or near the source or sink of any FTR they own and the day-ahead congestion LMP difference is greater than the real-time congestion LMP difference the profits from that FTR may be subject to forfeiture for that hour. An increment offer or decrement bid is considered near the source or sink point if 75 percent or more of the energy injected or withdrawn, and which is withdrawn or injected at any other bus, is reflected on the constrained path between the FTR source or sink. This rule only applies to increment offers and decrement bids that would

increase the price separation between the FTR source and sink points.

Figure 13-16 demonstrates the FTR forfeiture rule for INCs and DEC. The INC or DEC distribution factor (dfax) is compared to the largest impact withdrawal or injection dfax. If the absolute difference between the virtual bid and its counterpart is greater than or equal to 75 percent, the virtual bid is considered for forfeiture. This is the metric in the rule which defines the impact of the virtual bid on the constraint.

In the first part of the example in Figure 13-16, the INC has a dfax of 0.25 and the maximum withdrawal dfax on the constraint is -0.5. The difference between the two dfax values is -0.75 (0.25 minus -0.5). The absolute value is 0.75. In the second part of the example in, the DEC has dfax of 0.5 and the maximum injection dfax on the constraint is -0.25. The difference between the two dfax values is 0.75 (-0.25 minus 0.5). The absolute value is also 0.75.

Figure 13-16 Illustration of INC/DEC FTR forfeiture rule

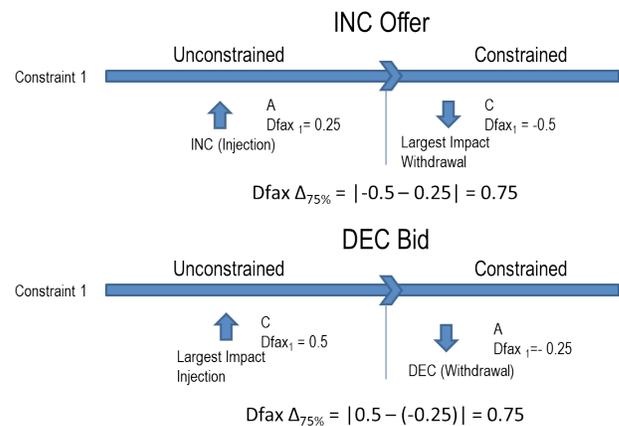


Figure 13-17 shows the FTR forfeiture values for both physical and financial participants for each month of June 2010 through December 2015. Currently, counter flow FTRs are not subject to forfeiture regardless of INC or DEC positions. Total forfeitures for the 2015 to 2016 planning period were \$0.17 million (0.03 percent of total FTR target allocations).

³⁴ See PJM OATT. Liquidation of Financial Transmission Rights in the Event of Member Default. § 7.3.9.

³⁵ See PJM OATT. Default Allocation Assessment § 15.2.2.

Figure 13-17 Monthly FTR forfeitures for physical and financial participants: June 2010 through December 2015

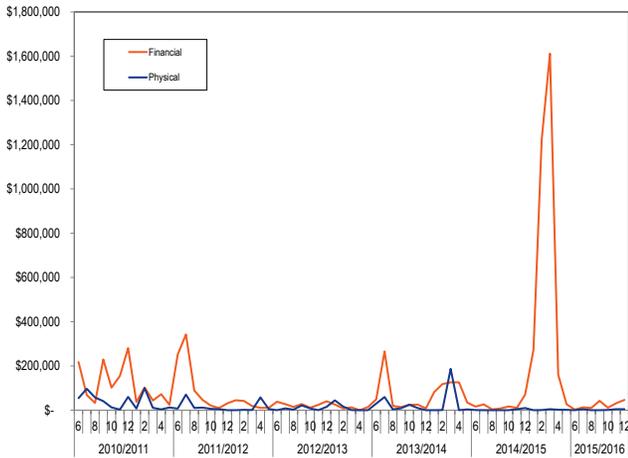


Figure 13-18 FTR forfeitures for INCs/DECs and INCs/DECs/UTCs for both the PJM and MMU methods: January 2013 through December 2015

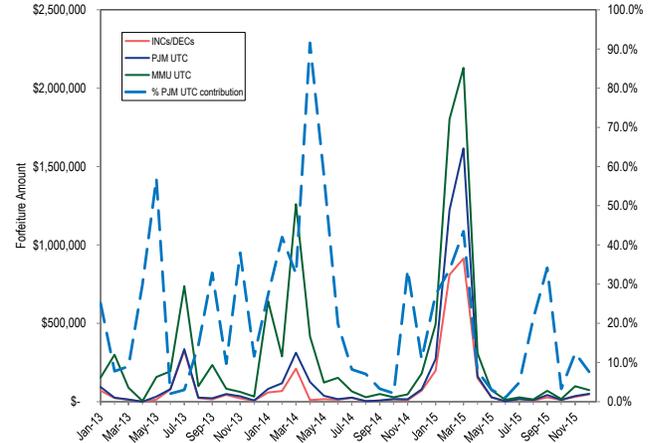


Figure 13-18 shows the FTR forfeitures on just INCs and DECs, FTR forfeitures on INCs, DECs and UTCs using the method proposed by PJM and FTR forfeitures on INCs, DECs and UTCs using the method proposed by the MMU from January 2013 through December 2015. The method proposed by PJM for calculating forfeitures associated with UTCs was implemented on September 1, 2013, and for each month thereafter. UTC forfeitures before September 2013 were not billed, but are included to illustrate the impact of the different methods of calculating forfeitures. The UTC curves include all forfeitures for the month associated with INCs, DECs and UTCs. The dotted line indicates the percentage of forfeitures caused by UTC transactions using PJM’s method, excluding INCs and DECs.

Up-to-Congestion Transaction FTR Forfeitures

The current implementation of the FTR forfeiture rule submitted by PJM is not consistent with the application of the forfeiture rule for INCs and DECs. Under PJM’s method the simple net dfax of the UTC transaction is the only consideration for forfeiture, representing the contract path of the UTC transaction. Under this method, the net dfax is the sink dfax of the UTC minus the source dfax of the UTC. The net dfax alone cannot be used as an indication of helping or hurting a constraint, rather, the direction of the constraint must also be considered. In addition, the PJM method only considers UTC transactions whose net dfax is positive. This logic not only passes transactions that should fail the forfeiture test, but fails transactions that should pass the forfeiture test.

PJM’s logic also does not hold when one of the points of the UTC is far from the constraint. In this case, one side of the UTC would have a dfax of zero, indicating no connection to the constraint being considered. If a point of the UTC transaction has no connection to the constraint, there can be no power flow directly between the two UTC points, so the simple net dfax, cannot logically be used in this case to indicate whether a UTC is eligible for forfeiture. Under the MMU method this UTC would be treated as an INC or DEC and follow the same rules as the current INC/DEC FTR forfeiture rule.

Figure 13-19 shows an example of the two proposed FTR forfeiture rules for UTC transactions. In both cases, the net dfax of the UTC is taken. Under the PJM method the net dfax of the UTC is calculated by subtracting the dfax of the sink bus A (0.2) from the dfax of the source bus B (0.5) to get a net dfax of -0.3. If this net dfax value is greater than 0.75 the UTC is subject to forfeiture. Under the MMU method, the net dfax is calculated by subtracting the dfax of sink A (0.2) from the dfax of source bus B (0.5) to get a net dfax of 0.3. This net dfax is then compared to the withdrawal point with the largest impact on the constraint. The MMU method compares the net UTC dfax to a withdrawal because the UTC is a net injection on this constraint. In this example, the net dfax is 0.3 and it is compared to the largest withdrawal dfax at C (-0.5). The absolute value of the difference is calculated from these two points to determine if the UTC fails the FTR forfeiture rule. In this case, the absolute value of the difference is the dfax of bus C (-0.5) minus the net UTC dfax (0.3) for a total impact of 0.8, which is over the 0.75 threshold for the FTR forfeiture rule. The result is that this UTC fails the FTR forfeiture rule. The MMU proposes to apply the same rules to UTC transactions as is applied to INCs and DEC, treat the UTC as equivalent to an INC or a DEC depending on its net impact on a given constraint. A UTC transaction is essentially a paired INC/DEC, it has a net impact on the flow across a constraint, as an INC or DEC does. While total system power balance is maintained by a UTC, local flows may change based on the UTC's net impact on a constraint. The MMU method captures this impact.

Figure 13-19 Illustration of UTC FTR forfeiture rule

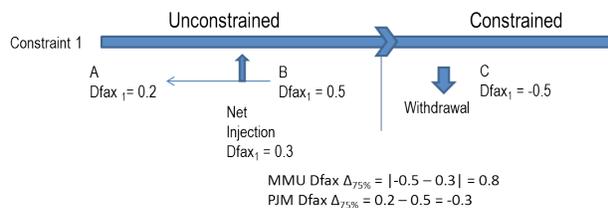
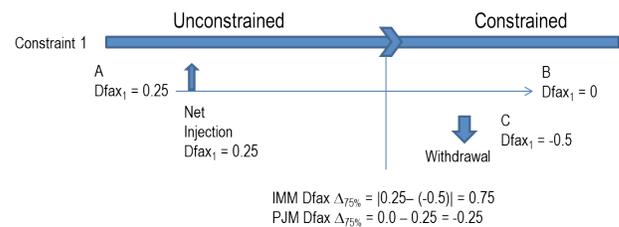


Figure 13-20 demonstrates where the assumption of contract path for UTCs in PJM's method does not hold with actual system conditions when either the source or sink of the UTC does not have any impact on the constraint being considered. In this case, the UTC is effectively an INC or a DEC relative to the constraint, as the other end of the UTC has no impact on the constraint.

However, the PJM approach would not treat the UTC as an INC or DEC, despite the effective absence of the other end of the UTC. This is a flawed result.

As demonstrated in Figure 13-20, the UTC is no different than an INC on the constraint being considered. Using the PJM method this UTC would pass the FTR forfeiture rule. The net dfax would be calculated as the dfax of bus B (0) minus the dfax of bus A (0.25) for a net dfax of -0.25, with no comparison to any withdrawal bus. Since the dfax is negative, it would pass the PJM FTR forfeiture rule. Under the MMU's method, the net dfax is calculated as an injection with a dfax of 0.25, and then the absolute value of the difference is calculated between that injection and the dfax of the largest withdrawal on the constraint. In this example that is bus C, with a dfax of -0.5. The result is an absolute value of the dfax difference of 0.75, meaning that this UTC fails the FTR forfeiture test.

Figure 13-20 Illustration of UTC FTR Forfeiture rule with one point far from constraint



The MMU recommends that the FTR forfeiture rule be applied to UTCs in the same way it is applied to INCs and DEC.

